

Governance, Risk and Best Value Committee

10.00am, Tuesday, 4 June 2024

Accessibility of Council information – referral from the Policy and Sustainability Committee

Executive/routine Wards	Routine
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1. For Decision/Action

- 1.1 The Policy and Sustainability Committee has referred a report on the work undertaken and planned to improve the Council's accessibility to information and services to the Governance, Risk and Best Value Committee for consideration of the annual accessibility audits referenced at 4.23.9 of the report by the Executive Director of Corporate Services.

Dr Deborah Smart
Executive Director of Corporate Services

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Referral Report

Accessibility of Council information – referral from the Policy and Sustainability Committee

2. Terms of Referral

2.1 On 29 May 2024, the Policy and Sustainability Committee considered a report by the Executive Director of Corporate Services on the work undertaken and planned to improve the Council's accessibility to information and services, in particular within its Customer Services area, the website and at committees.

2.2 Motion

To note the report by the Executive Director of Corporate Services.

- moved by Councillor Day, seconded by Councillor Watt

Amendment 1

- 1) To note the report by the Executive Director of Corporate Services.
- 2) To acknowledge that despite progress, accessibility of information remained a critical issue for people with learning disabilities and their carers.
- 3) To agree to increase the availability of information in Easy Read format using supporting images, prioritising key forms and policies with the highest use.
- 4) To agree to engage with organisations such as FAiR (The Family Advice and Information Resource), People First (Scotland), and Disability Equality Scotland to enhance accessibility efforts.

- moved by Councillor Kumar, seconded by Councillor Campbell

Amendment 2

- 1) To note the report by the Executive Director of Corporate Services.
- 2) To welcome the work ongoing to make Council communications more accessible but recognise that there were plenty of examples of actions the Council could take to improve this further which were not covered in the report, for example developing Easy Read versions of communications or exploring options to achieve Web Content Accessibility Guidelines (WCAG) AA or AAA standard, amongst others.

- 3) To further note that there was not currently any monitoring or evaluation processes in place around this work, and that the “aspirations” listed in the report by the Executive Director of Corporate Services (sections 4.23.6 onwards) contained no SMART targets.
- 4) To therefore agree that an Action Plan and Action Tracker be developed to outline the specific improvements being made to improve the accessibility of Council information, with this Action Plan presented to Committee in 2 cycles.
- 5) To further agree that this Action Plan would be developed in consultation with Disabled People’s Organisations (DPOs) and would be incorporated into the Council’s Equality and Diversity Framework when this was developed in 2025.
- 6) To refer the report by the Executive Director of Corporate Services to the Governance, Risk and Best Value Committee to consider the annual accessibility audits referenced at 4.23.9 of the report.

- moved by Councillor Parker, seconded by Councillor Mumford

In accordance with Standing Order 22(13), Amendment 1 was accepted as an addendum to the motion, and Amendment 2 was adjusted and accepted as an addendum to the motion.

In accordance with Standing Order 22(13), Amendment 1 was accepted as an addendum to Amendment 2.

Voting

The voting was as follows:

For the motion (as adjusted) – 9 votes

For Amendment 2 (as adjusted) – 7 votes

(For the motion (as adjusted): Councillors Beal, Davidson, Day, Dijkstra-Downie, Doggart, Lang, Meagher, Watt and Whyte.

For Amendment 1 (as adjusted): Councillors Aston, Biagi, Campbell, Kumar, Miller, Mumford and Parker.)

Decision

To approve the following adjusted motion by Councillor Day:

- 1) To note the report by the Executive Director of Corporate Services.
- 2) To acknowledge that despite progress, accessibility of information remained a critical issue for people with learning disabilities and their carers.
- 3) To agree to increase the availability of information in Easy Read format using supporting images, prioritising key forms and policies with the highest use.
- 4) To agree to engage with organisations such as FAiR (The Family Advice and Information Resource), People First (Scotland), and Disability Equality Scotland to enhance accessibility efforts.

- 5) To welcome the work ongoing to make Council communications more accessible but recognise that there were plenty of examples of actions the Council could take to improve this further which were not covered in the report, for example developing Easy Read versions of communications or exploring options to achieve Web Content Accessibility Guidelines (WCAG) AA or AAA standard, amongst others.
- 6) To further note that there was not currently any monitoring or evaluation processes in place around this work, and that the “aspirations” listed in the report by the Executive Director of Corporate Services (sections 4.23.6 onwards) contained no SMART targets.
- 7) To further agree that this Action Plan would be developed in consultation with Disabled People’s Organisations (DPOs) and would be incorporated into the Council’s Equality and Diversity Framework when this was developed in 2025.
- 8) To refer the report by the Executive Director of Corporate Services to the Governance, Risk and Best Value Committee to consider the annual accessibility audits referenced at 4.23.9 of the report.

(Reference – report by the Executive Director of Corporate Services, submitted.)

3. Background Reading/ External References

[Policy and Sustainability Committee of 28 May 2024 - webcast](#)

4. Appendices

Appendix 1 – Report by the Executive Director of Corporate Services

Policy and Sustainability Committee

10.00am, Tuesday, 28 May 2024

Accessibility of Council information

Executive/routine
Wards

1. Recommendations

1.1 To note the report.

Dr Deborah Smart

Executive Director of Corporate Services

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Accessibility of Council information

2. Executive Summary

- 2.1 This report outlines the work undertaken and planned to improve the Council's accessibility to information and services, in particular within its Customer Services area, the website and at committees.

3. Background

- 3.1 The Policy and Sustainability Committee had previously asked for details of how the Council could improve accessibility within its communications both internally and externally.

4. Main report

- 4.1 This report seeks to outline the steps taken within the Council to improve accessibility within its communications both to residents and the wider public, and internally.
- 4.2 The Council has a strong commitment to deliver and develop services that make it easier for people from all backgrounds to access support, whether making requests in person or through appropriate contact options.

Service Improvements in Customer Services

- 4.3 The strong commitment to accessibility is a key component and driving force for the Council's Customer Services teams. Ensuring that all residents and members of the public can access services is key and there are a number of initiatives that have been implemented to improve how the Council approaches this.
- 4.4 Local office teams continue to help citizens progress a wide range of service requests and similar support is available from the Council's contact team. As well as providing direct access to services, local office teams provide practical support on how to use computers/smart phones and self-service devices located in many public offices. This supports those who have difficulty using online forms or do not have access to an online device.

- 4.5 Registration service enhancements have resulted in deaths and births being able to be registered remotely via phone and teams, as well in person providing greater choice for customers.
- 4.6 Online services allow citizens to self-serve at a convenient time, 365 days a year and there have been improvements in the Council's online services to improve the customer experience.
- 4.6.1 The online customer service tool enables people to plan assistance before visiting a local office. Visitors can communicate their needs and any requirements online and ahead of their arrival. The system also provides in-the-moment training on how best to support people, helping to make visits as comfortable and stress-free as possible.
- 4.6.2 An improved online experience for all website users has been achieved with a new tool which lets visitors customise the website in a way that works best for them. This includes a screen reader to help people with visual impairments by reading website text aloud and technology to lets users change the way the website looks, from colour scheme to text font style, size, colour, and spacing. Recent website enhancements let users translate web content into over 100 languages, including 35 text-to-speech voices.
- 4.7 Improving the Council's service and offer is also due to getting good feedback. A key element of the online service is a customer feedback loop that enables customer insight to help to develop more intuitive forms. There are also customer satisfaction measurements on all major contact lines and within local offices (via QR codes). These are used to shape and improve service delivery including accessibility considerations.
- 4.8 There is ongoing work with relevant bodies, such as Social Security Scotland, Citizen Advice, Job Centre Plus, Edinburgh Tenant Federation etc to ensure that citizens receive appropriate, jargon free and knowledgeable support. Activities include reviewing letter correspondence with Citizens Advice to make invoices and requests for payment easier to understand.
- 4.9 There has been better coordination of interpretation and translation activities for the Council, both in regard to written material and in person support. Recent developments have seen an automated translation service piloted which reduces operating costs and has the potential for services to explore further uses.
- 4.10 Home visits are now offered to citizens who need it to assist with Council Tax and Benefits administration.

Training and Guidance – Website and Communications

- 4.11 The website is a key element of how the Council communicates information to the public. There have been a number of initiatives and training provided to ensure that the website is improved and that accessibility standards are met.

- 4.11.1 Web accessibility training - Regular web publishing training includes session on writing for the web and accessibility.
 - 4.11.2 Accessibility surgeries: Word and PDFs – weekly hands on sessions.
 - 4.11.3 Written guidance for the Website and other Digital platforms - Web accessibility guidance, Accessibility checklists for Jadu publisher, Accessible PDF guidance, Web writing style guide, Multimedia accessibility, Social media accessibility.
- 4.12 There are also significant training and guidance on offer on communications generally which interlinks with the web training and guidance, these include:
- 4.12.1 Customer-focused communications training - One-hour sessions giving guidance on how to achieve a customer focused tone to Council communications. Covers structure your writing, brand and accessibility.
 - 4.12.2 Social media training - Includes social media accessibility. Three sets of three sessions (general, Twitter and Facebook) offered per year. Also delivered on demand.
 - 4.12.3 House writing style.
 - 4.12.4 Report writing guidance (Links to accessible PDF guidance and to [guidance for consultants and contractors](#)).
 - 4.12.5 Readability guidance.

Website Accessibility

- 4.13 In 2018 a cross-departmental Working Group was established to drive efforts to ensure the Council met The Public Sector Bodies (Websites and Mobile Applications) Accessibility Regulations by the implementation date.
- 4.14 The scope of the group included the Council website, self-contained Council-supplied service websites, and affiliated third-party supplied service websites, with the Group reporting to the Corporate Leadership Team on plans and actions.
- 4.15 In 2021, the Cabinet Office, in its statutory role for monitoring compliance with the legislation, carried out an Accessibility Audit of www.edinburgh.gov.uk which included a number of transactional services and the third-party supplied products used. The Cabinet Office's Final Report recognised that the Council's website and Accessibility Statement were fully compliant and their recommendation to the Equality and Human Rights Commission was that no further action was required.
- 4.16 Further accessibility audits (in line with legislative recommendations) by third party specialists were commissioned by the Council in March 2022 and is now an annual activity.

Committee and Committee papers

- 4.17 Policy and Sustainability Committee on 17 January 2023 agreed to establish a series of independently facilitated cross party workshops to:

Policy and Sustainability Committee– 28 May 2024

- 4.17.1 consider actions that could be undertaken at a Council level, to increase the diversity of the councillors as a representative democratic body.
- 4.17.2 propose changes to working practices for councillors to support full involvement and limit barriers to participation.
- 4.17.3 make recommendations for ongoing changes in Council structures, systems and culture to improve inclusion and wellbeing, and improve retention of councillors from underrepresented groups in Edinburgh.
- 4.18 It was further recommended that parties should ensure that at least one of their representatives will be a woman to ensure gender balance on the workshops. A programme of facilitated workshops has been delivered for elected members, facilitated jointly by COSLA and the Improvement Service considering a range of diversity issues, identifying recommended actions around structures, systems and culture. Specialist advisers were invited to input to each workshop. The first workshop was held in August 2023 and the following topics have discussed:
- 4.19 Workshops:
- 4.19.1 Workshop 1 Introduction and scene setting;
 - 4.19.2 Workshop 2 Gender
 - 4.19.3 Workshop 3 Disability
 - 4.19.4 Workshop 4 Caring responsibilities / income
 - 4.19.5 Workshop 5 Race/Ethnicity
 - 4.19.6 Workshop 6 Recommended actions - (30 May 2024)
- 4.20 Recommendations will be reported to a future meeting of the Policy and Sustainability Committee focussing on areas within the Council's control, noting also that political parties have their own responsibilities to select candidates. Prior to the workshops, an anonymous survey of elected members was undertaken to identify any equality issues of concern. This was based on the candidate survey used by Scottish Government prior to the May 2022 Scottish Council Elections, with some additions informed by the recent census to access additional data. This survey is to be scheduled for issue at the start of each new Council with revisions as necessary.
- 4.21 Committee papers since 2003 have been on the Council's website as PDFs. The Council is exploring a new contract for its committee management system and a key aim is to improve the accessibility of its committee papers and whether changes such as making available word or HTML format documents would be a useful addition.
- 4.22 Changes to Procedural Standing Orders are being introduced in August 2024. This will increase the notice required for Council and Committee papers beyond the statutory requirement of three clear days to 6 clear days. This is to improve accessibility to those participating in the democratic decision making, allowing greater time for elected members and the public to consider proposals.

Areas of ongoing improvement

4.23 There are areas for improvement and continued development that are being pursued. The main areas are as follows:

4.23.1 Ensuring all PDF content is fully accessible and encouraging wherever possible the use of alternative content formats such as web-pages. A PDF review is in progress which is working with services to make sure content is published appropriately:

4.23.1.1 content pages and Jadu forms instead of PDFs;

4.23.1.2 use of long report Jadu template plus plain English summaries / Introductions on web pages;

4.23.1.3 if content cannot be presented as a webpage, ensure PDF meets standards including charts and diagrams described in body of text and that there is an easy to understand summary on webpage; and

4.23.1.4 disclaimers on inaccessible PDFs and request to contact the Council if information is needed in other formats.

4.23.2 The next British Sign Language (BSL) Plan 2024-30 is currently being drafted and will include several actions to improve support and access to information for BSL speakers. This includes areas such as:

4.23.2.1 developing BSL videos to provide information about using online services.

4.23.2.2 improving availability and quality of information about services, voter information.

4.23.2.3 improving access and support to BSL interpreters.

4.23.2.4 providing and promoting BSL and deaf awareness sessions for colleagues.

4.23.2.5 promote use of Contact Scotland BSL to call the Council using their video relay service.

4.23.3 New and ongoing activities include; comprehensive signposting of local and national bodies, this will include the National Support Network who provide a search tool to advice and support, a move to consolidate telephone numbers to make it easier to contact council services, and building a searchable service knowledgebase that could be accessed by the public (similar to the developing knowledgebase used by cross skilled service teams, but with a specific customer focus).

4.23.4 Theme 2: Access to facilities and support of City of Edinburgh Council's Equality and Diversity Framework 2020-2025 states the need for improved stakeholders experience easier access to services through increased digital inclusion and alternative access to services.

4.23.5 A progress report went to Policy and Sustainability [12 March 2024](#), highlighting:

4.23.5.1 Digital inclusion has widened access to devices, particularly for children and young people but also for others without access at home. The Council has introduced a wide range of online services and created a new Intranet External Gateway. Support has also been put in place for those who need to develop digital literacy skills.

4.23.5.2 The online application form to access social housing aims to reduce barriers, particularly for older people and disabled people. The work has been informed by the Accessible Housing Study and staff are available to support online application, with paper applications still available where preferred.

Aspirations

4.23.6 The Council aspiration is that its public website, the Council intranet, and the third-party supplied sites which are used to deliver services on behalf of the Council, meet the latest web content accessibility guidelines (WCAG 2.2). This aspiration also extends to the self-contained Council-supplied service websites. In doing so, we aim to reinforce City of Edinburgh Council's commitment to inclusivity and equality.

4.23.7 To achieve that goal, Digital Services' Web Team have put in place the training and guidance initiatives outlined in 4.11 of the report. Through their work to raise awareness and educate, the Team strives to help and direct those who publish content on behalf of the Council. In addition to the learning methods highlighted previously, an e-learning module is also now in development to provide a more immediate learning resource.

4.23.8 The Web Team has an on-going programme to review content with a view to converting PDF format documents and forms into more accessible web page formats.

4.23.9 Following the positive outcome of the Cabinet Office Audit in 2021, Digital Services has carried out further annual accessibility audits in line with legislative recommendations. Budget has been made available to ensure this will continue as an annual activity in future.

4.23.10 In 2023, the findings which were highlighted in the Audit Report drove a series of improvements not simply to published content but to our website supplier's platform, and to that of several third-party supplier sites as well.

4.23.11 In 2024, the Council worked with an accessibility employer – The Access Technology Company – as the Audit partner whose Audit Report concluded that the Council was “close to meeting WCAG 2.2, Conformance Level

AA". Work is underway to implement the improvement actions identified in the report.

4.23.12 The Council continue to review service delivery activities to deliver improvements and are currently reviewing capability that automatically simplifies webpage content into digestible summaries by eliminating unnecessary content, making information more accessible and reducing reading time. It also offers quick explanations for common acronyms, such as VAT found on the page. These simplified summaries can be read aloud by the Council's existing screen reader functionality and translated into over 100 languages.

5. Next Steps

- 5.1 The areas of ongoing improvement outline the work that is getting taken forward.
- 5.2 Improving accessibility remains a critical issue from an equalities perspective and would anticipate this forming part of The City of Edinburgh Council's new Framework required for March 2025, as part of the Council's Public Sector Equality Duty.

6. Financial impact

- 6.1 All financial impacts in the workstreams within the report are included within project and/or directorate budgets.

7. Equality and Poverty Impact

- 7.1 As part of The City of Edinburgh Council's commitment to the delivery of the Public Sector Equality Duty all workstreams mentioned in this paper aim to:
 - 7.1.1 eliminate unlawful discrimination;
 - 7.1.2 advance equality of opportunity; and
 - 7.1.3 foster good relations.

8. Climate and Nature Emergency Implications

- 8.1 There are no climate or nature emergency implications as a result of this report.

9. Risk, policy, compliance, governance and community impact

- 9.1 The Equality Act 2010 applies to the work outlined in the report.

10. Background reading/external references

- 10.1 [Mainstreaming equality: Scottish Government's equality duties - gov.scot \(www.gov.scot\)](http://www.gov.scot)
- 10.2 [The Equality Act 2010 \(Specific Duties\) \(Scotland\) Regulations 2012 \(legislation.gov.uk\)](http://legislation.gov.uk)

11. Appendices

None.