

Accessibility Statement

Umbraco portion of Senedd Website

Version 4.0 | 08/12/2020

This accessibility statement applies to the following Senedd websites which all share a common platform and underlying design schema:

- senedd.wales | senedd.cymru
- research.senedd.wales | ymchwil.senedd.cymru
- youthparliament.wales | seneddymchwil.cymru

Separate statements can be found for the Welsh Parliament's other websites including:

- petitions.senedd.wales | deisebau.senedd.cymru
- business.senedd.wales | busnes.senedd.cymru

Whilst many issues identified during testing are noted in the following document as having been resolved, we are currently in the process of assessing the work required to fix the remaining issues identified and identifying a timeline to implement these.

These websites are run by the Welsh Parliament. We want as many people as possible to be able to use these websites. For example, that means you should be able to:

- change colours, contrast levels and fonts
- zoom in up to 300% without the text spilling off the screen
- navigate most of the website using just a keyboard



- navigate most of the website using speech recognition software, except for applying some filters on the 'Search' page
- listen to most of the website using a screen reader (including the most recent versions of JAWS, NVDA and VoiceOver)

AbilityNet has advice on making your device easier to use if you have a disability.

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2. How accessible this website is

We know some parts of this website are not fully accessible:

- Alternative text attributes are not present for some linked images
- Users of Dragon Naturally Speaking are not able to interact with some search filtering options
- The cookie notice is sometimes the last element in the tabbing order
- Some content is announced twice whilst using screen reader software
- Text transcripts are not present for all pre-recorded video
- Some PDFs created since September 2018 and most PDFs older than this are not accessible to screen reader software

Feedback and contact information

If you need information on this website in a different format like accessible PDF, large print, easy read, audio recording or braille:

email contact@senedd.wales

Call 0300 200 6565

Address Welsh Parliament, Cardiff Bay, CF99 1SN

We'll consider your request and get back to you within 5 working days.

Reporting accessibility problems with this website

We're always looking to improve the accessibility of this website. If you find any problems not listed on this page or think we're not meeting accessibility requirements, contact us using the form at <https://senedd.wales/contact> or email address contact@senedd.wales

Enforcement procedure

The Equality and Human Rights Commission (EHRC) is responsible for enforcing the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018 (the

'accessibility regulations'). If you're not happy with how we respond to your complaint, **contact the Equality Advisory and Support Service (EASS)**.

3. Contacting us by phone or visiting us in person

We provide a text relay service for people who are D/deaf, hearing impaired or have a speech impediment.

The reception areas of our offices, including the Senedd, Pierhead, Tŷ Hywel and North Wales Offices each have audio induction loops and we can also provide personal audio induction loops that work with our audio translation systems in these buildings and when our committees are meeting remotely. If you contact us before your visit we can usually arrange a British Sign Language (BSL) interpreter. Our building signage is available in braille and we welcome assistance dogs.

Further information on how our buildings and meetings are accessible can be found at <https://senedd.wales/accessibility>

Find out how to contact us at <https://senedd.wales/contact>

4. Technical information about this website's accessibility

The Welsh Parliament is committed to making its website accessible, in accordance with the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018.

Compliance status

This website is partially compliant with the **Web Content Accessibility Guidelines version 2.1** AA standard, due to the non-compliances and exemptions listed below.

We are striving to be compliant with the AA standard by the end of 2021 for all active content produced internally by the Senedd.

However, a large part of the information on our website consists of archive documents which form a part of the public record of Senedd Business. It would not be appropriate to update these documents to meet the current standards as they reflect the information as it was published at that point in time. Should we need to re-work this information at any time we will

ensure that any new outputs based on this information is as accessible as the original data allows.

There are also documents produced by external bodies which the Senedd is obliged to accept for publication. Whilst we advise these bodies on the accessibility of their submissions, in these circumstances we are obliged to publish the materials as received.

5. Non-accessible content

The content listed below is non-accessible for the following reasons.

Non-compliance with the accessibility guidelines

1. Audio descriptions are not present for pre-recorded video. This is a failure of WCAG 2.1 success criterion 1.2.5 Audio Description (Pre-Recorded).
 - a. At present we do not routinely audio describe our pre-recorded video content. The Senedd Commission is in the process of changing this practice with the intention of future video content being made available with an audio description option, where appropriate.
 - b. A contract for Subtitling/transcribing and Audio Description by a competent third party is currently going through our procurement process.
 - c. We plan to routinely present audio description for pre-recorded video by the end of 2021.

2. A text transcript is not consistently present for pre-recorded video. This is a failure of WCAG 2.1 success criterion 1.2.3 Audio Description or Media Alternative (Pre-Recorded).
 - a. The Senedd does attempt to subtitle/transcribe our video content, however this in-house approach is not currently applied consistently.
 - b. A contract for Subtitling/transcribing and Audio Description by a competent third party is currently going through our procurement process.
 - c. We plan to routinely present transcription for new pre-recorded video content by the end of 2021.

3. HTML validation errors are present which may influence how assistive technology software handles content on the site. This is a failure of WCAG 2.1 success criterion 1.4.1 Parsing.

a. This is currently under investigation by our development partner Method4.

b. We plan to resolve this early in 2021

4. Accessible names are not provided or incorrectly given to most non-text content such as decorative images, linked images, form input fields and buttons. This is a failure of WCAG 2.1 success criterion 1.1.1 Non-text Content.

a. This is currently under investigation by our development partner Method4.

b. We plan to resolve this early in 2021

5. The tabbing order is illogical, with the cookie notice being the last element in the focus order. This is a failure of WCAG 2.1 success criterion 2.4.3 Focus Order.

a. This is under investigation by the supplier of our Cookie Control solution - Civic UK. We understand that with the present version of this tool the Cookie Control should be the first item selected on page load - but this is not reproduced consistently.

b. We plan to resolve this as soon as a solution is provided by our supplier

6. Users of speech recognition tools are unable to interact with date calendar selector, and the filtering options for results on the 'Search' and 'Find a member' pages. This is a failure of WCAG 2.1 success criterion 4.1.2 Name, Role Value.

a. This is currently under investigation by our development partner Method4.

b. We plan to resolve this early in 2021

PDF related matters to be fixed going forwards

The following errors relating to PDFs on our website were picked up. For each of these we have amended our internal practice to improve the situation for future internally created PDFs (from January 2021 onwards).

We will not be able to revisit existing PDFs of historic value which remain on our website but we will ensure that when any standing document is updated or new document created internally they are published to meet the WCAG 2.1 standard.

We must also note that the Senedd Website includes a number of PDF documents that the Senedd is required to publish when received from third party organisations. Whilst we will advise these organisations on best practice, we do not have full control over the content or quality of these documents presented for publication by the Senedd.

- 7.** Accessible names are not provided or incorrectly given to most non-text content such as decorative images, linked images, form input fields and buttons. This is a failure of WCAG 2.1 success criterion 1.1.1 Non-text Content.
- 8.** Contrast issues are present within PDF documents. This is a failure of WCAG 2.1 success criterion 1.4.3 Contrast (Minimum).
- 9.** Alternatives for non-text content is not correctly provided for PDFs. Images and figures within lack an alternative text value, and other non-text content is not tagged. This is a failure of WCAG 2.1 success criterion 1.1.1 Non-text Content
- 10.** List structures and tables within PDFs are not marked up in a way that exposes it to assistive technologies. This is a failure of WCAG 2.1 success criterion 1.3.1 Info and Relationships.
- 11.** PDF bookmarks do not parallel the document structure. This is a failure of WCAG 2.1 success criterion 2.4.1 Bypass Blocks
- 12.** The language of PDF documents has not been defined; this may influence the way screen reader software announce text. This is a failure of WCAG 2.1 success criterion 3.1.1 Language of Page.

Exempt

The following were initially assessed as non-compliant but the Senedd believe the content to be exempt from the requirements of WCAG 2.1

- 13.** Welsh text is not defined correctly which may lead to screen readers announcing content incorrectly. This is a failure of WCAG 2.1 success criterion 3.1.2 Language of Parts.
 - a. This assessed failure relates to the Senedd's use of words with a Welsh origin such as Senedd, Neuadd, Cwrt, Cofnod and Llywydd.

- b. The Senedd treats these words/phrases as both a “proper name” and “part of the vernacular” of the English language and so there is no need to mark them up separately as Welsh text on an English page.
- c. In this situation we believe these words to be deemed exempt from this requirement as they should be considered a part of the English language text on the page.
- d. When pages including these words were tested using the JAWS screen reading software most of these words were successfully read by the default English voice. The only exception was Cwrt which the software spelled out to the user.

Resolved since last formal test

The following aspects were picked up in our last formal test by Zoonou but since that point we believe they have been resolved across these websites and have confirmed this with internal testing.

A formal re-test by our Third Party assurance team from Zoonou has already been booked for Spring 2021 and we believe that at that time these items will all be confirmed as resolved across the website.

14. For fields with specific input requirements, this information is not communicated in the form fields label. This is a failure of WCAG 2.1 success criterion 3.3.2 Labels or Instructions.

- a. This failure related to the Postcode search field as a part of our Find a Member page. This feature now makes clear with an announced error when the input is not in the expected shape of a UK postcode.

15. The Homepage title does not identify the page contents or purpose. This is a failure of WCAG 2.1 success criterion 2.4.2 Page Titled.

- a. During development this page was simply titled "Home", since this was raised the page title has been updated to indicate which organisation it is the homepage for to give clarity to the reader.

16. Embedded content is not labelled in a way that assistive technologies are informed of its purpose. This is a failure of WCAG 2.1 success criterion 2.4.1 Bypass Blocks.

- a. Whilst initial technical changes had improved the situation there were a small number of places where user error causing this failure was highlighted in the most recent scans. These items have now been corrected and a routine procedure for scanning our website for such errors is being put in place.

17. The heading structure on some pages is incorrect due to skipped heading levels. This is a failure of WCAG 2.1 success criterion 2.4.1 Bypass Blocks.

- a. Whilst initial technical changes had improved the situation there were a small number of places where user error causing this failure was highlighted in the most recent scans. These items have now been corrected and a routine procedure for scanning our website for such errors is being put in place.

18. Contrast issues are present for some user interface components on the site. This is a failure of WCAG 2.1 success criterion 1.4.11 Non-Text Contrast.

- a. One example of this remained un-corrected at last formal test. This has since been resolved.
- b. Development Team remain aware of the limitations of our corporate colour palette and remain vigilant when developing new website features.

19. Aria is used for labelling of some page controls, but the elements are not properly associated. Resulting in no name being announced when operating the site with a screen reader. This is a failure of WCAG 2.1 success criterion 4.1.2 Name, Role Value

- a. Labels now correctly associated with the elements to which they relate.

Disproportionate burden

We've assessed the cost of fixing the issues identified. We are not claiming disproportionate burden for any non-compliance. We are actively working to bring all current content up to the required standard.

However, a large part of the information on our website consists of archive documents which form a part of the public record of Senedd Business. It would not be appropriate to update these documents to meet the current standards as they reflect the information as it was published at that point in time. Should we need to re-work this information at any time we will ensure that any new outputs based on this information is as accessible as the original data allows.

Content that's not within the scope of the accessibility regulations

PDFs and other documents

Some of our PDFs and Word documents are essential to providing our services. We are in the process of improving the accessibility of these or replacing these with HTML where possible.

The accessibility regulations **do not require us to fix PDFs or other previously published documents** if they're not essential to providing our ongoing services.

As many of our archive documents form a part of the public record of Senedd Business it would not be appropriate to update these documents to meet the current standards. They represent the information as it was available at that time.

Any new PDFs or Word documents we publish from January 2021, that have been generated internally, will meet current accessibility standards.

We must also note that the Senedd Website includes a significant number of PDF documents that the Senedd is required to publish when received from third party organisations. Whilst we will advise these organisations on best practice we do not have full control over the content or quality of these documents presented for publication by the Senedd

Video Content

Some pre-recorded video present on the site lacks a text transcript to accompany videos. This is a failure of WCAG 2.1 success criterion 1.2.3 Audio Description or Media Alternative (Pre-Recorded). Once we have secured sufficient expert capeability in early 2021, all future video will be clearly marked-up if a media alternative is available (including Audio Described versions) and/or pre-recorded video content will have captions provided.

6. What we are doing to improve accessibility

The WCM Project which delivered the updated design and platforms for our website in December 2020 gives a step improvement in the accessibility across our website ecosystem.

This project has also put in place internal processes to improve the planning for accessibility of our published documents and web content going forward through better templating and internal practices.

Basic guidelines for accepting third party documents for publication have also been put in place. These guidelines have been pro-actively shared with our regular document providers and will be shared with others on a need-basis.

All Senedd web-editors receive basic training on web accessibility as a part of the induction to this role. Further accessibility training is offered to those whose role involves technical and feature development for our website.

Whilst Zoonou have conducted the initial assessment of our website through automated tests and expert user assessment against the WCAG 2.1 criteria, the new site is still to undergo testing by a team of disabled users with access needs and further development of the site is expected as a result of that in-situ testing during 2021.

The learning from the development of this site will also be passed on as lessons learned for any future web-improvement projects.

7. Preparation of this accessibility statement

This statement was prepared on 08/12/2020. It was last reviewed on 08/12/2020 prior to the release of a new iteration of the Senedd Website to the public on 17 December 2020.

This website was last formally tested by a Third Party on 22/10/2020. The test was carried out by Zoonou to a scope provided by the Senedd project team.

Not all pages on the site have been tested individually, a representative sample of pages were chosen ensuring that this sample included all key website features. At the time of drafting this statement, the site has undergone automated testing and a sample of pages checked by an expert user from Zoonou. Some items have been identified as resolved since the last formal, third party, test. These have been tested internally as resolved and are shown as such above.

A further formal re-test is scheduled for Spring 2021. There is also a plan in place for a second phase of testing involving representative disabled users to be carried out during Spring 2021 and any issues they identify to be properly recorded and, where feasible, remediated. An update to this statement following that round of testing and associated fixes will follow.

We used the following approach to decide on the sample of pages to test - **WCAG-EM**.