



LINK GROUP

POLICY FOR WEBSITE ACCESSIBILITY

APPROVED: 11TH SEPTEMBER 2009

EFFECTIVE DATE: 11TH SEPTEMBER 2009

REVIEW DATE: SEPTEMBER 2012

POLICY FOR WEBSITE ACCESSIBILITY

1. INTRODUCTION

The purpose of this policy is to ensure that Link's external facing websites, intranet, and extranet will be accessible to, and usable by disabled people and also by people whose preferred language is not English.

This policy shows how Link can make the reasonable adjustments required under the Disability Discrimination Act to make sure that the services we provide online are equally as accessible to disabled Internet users as to other members of the public and staff. It also shows what steps we can take to make the information and services we provide online accessible in other languages.

2. SCOPE

This policy is applicable to Link's external facing website(s), the intranet, the extranet, business software systems and any online facilities or other business systems which may be developed or purchased.

The policy is concerned with the design of these facilities so that people with disabilities may perceive, operate and understand our websites, online facilities and computer systems, including providing compatibility with a range of assistive technologies and languages.

The policy is a guide for those responsible for developing the websites, and those who are responsible for procuring systems and commissioning content for the websites.

3. PRINCIPLES

The following principles govern the operation of this policy. These are cooperatively produced international standards for accessibility to which websites and online facilities are expected to aspire. Our websites and online facilities will be:

- Perceivable - including descriptive text for images, audio captions, flexibility of layout and colour contrast
- Operable - making sites usable with keyboards and improving navigation
- Understandable - making content easier to read and input more logical
- Robust - ensuring that content and applications are compatible with assistive technology such as screen readers and magnifiers

4. OBJECTIVES

The objectives of the policy are to ensure that:

- Link's online facilities reach at least level A conformance with WCAG2 recommendations⁶
- Any development or additional online facilities conform at or above level A
- Provision for achieving or exceeding level A conformance is made in any partnership ventures which require online facilities

5. APPROACH AND METHOD

The Senior Management Group, in its formal approval of the policy, accepts full responsibility for the policy and ensuring its implementation. Day to day responsibility for the operation and

monitoring of this policy lies with the Web Development Officer of the Link group of companies. All relevant staff have a responsibility to ensure that the policy is applied as instructed.

The policy will be implemented through:

- Integrating it as a core process in any web development projects, or the procurement of any web based systems on the extranet, and the external facing websites.
- Working with partner organisations to promote accessibility to any jointly managed online facilities
- Upholding WCAG2 guidelines and specifications.
- Involving disabled users and advisors in the specification and design processes.
- Establishing a strategy for modernising the web site, extranet and intranet and reaching target levels of conformance.

6. MONITORING, PERFORMANCE MEASUREMENT AND REPORTING

The following areas will be subject to monitoring on a continuing basis:

- Conformance with WCAG2.
- Conformance with PAS 78, and its successor standard in due course⁷.
- Compatibility with evolving assistive technology support, eg: Screen readers, voice input technologies.
- Validate code against W3C standards⁸.
- User satisfaction levels
- User complaints, comments and suggestions

These areas will be monitored by the Web Development Officer and reported on regularly to his Director. If any significant issues of concern arise these will be dealt with by the Director who will report such matters to the Group Board and / or the Risk Management Committee. Any matter which demonstrates a serious failure of internal controls should also be reported immediately to the Chief Executive.

Periodic audits of policy compliance will be conducted by the Web Development Officer.

7. COMPLAINTS & APPEALS

Link Group has a policy and procedures for responding to complaints about any of our services. All customers are welcome to make informal contact with local officials to try to resolve any difficulties, but should you wish to make a formal complaint about the way we have provided a service we shall respond quickly. There is an appeal process if you are not satisfied with the first formal response from one of our managers.

Contact details for requesting further information about the accessibility policy will be available on the website.

Provision for users to lodge suggestions, comments and complaints with the website commissioner will also be available on the website.

If you remain dissatisfied after using our full appeal process you may be able to refer the matter to the Scottish Public Services Ombudsman. Link will advise you if a service other than the Ombudsman is more appropriate to consider your case.

8. EQUALITY & DIVERSITY

This policy has been reviewed and complies with Link Group's vision of providing socially inclusive services underpinned by our core values of equality and diversity⁹. Services and procedures which are developed from this policy will be subject to similar assessment.

9. POLICY AVAILABILITY

A summary of this policy will be available to the public on the Link Group website. This summary will be accompanied by a description of how users may adjust settings to meet their individual requirements.

Full copies are also available on request and free of charge from Link.

A summary of this policy can be made available in a number of other languages and other forms if required.

10. POLICY REVIEW

Link undertakes to review this policy regularly with regard to:

- o applicable legislation, rules, regulations and guidance
- o changes in the organisation
- o continued best practice.

The review will be conducted by Link Group's Strategy & Business Support Team.

Effective Date	Review Due	Approved by
11 th September 2009	September 2012	SMG

⁶ [WCAG2 - Web Content Accessibility Guidelines version 2: World Wide Web Consortium \(W3C\) December 2008. WCAG2 written by the Web Accessibility Initiative in W3C. These revised guidelines will change how website accessibility will be measured. Accessibility is graded A – AA – AAA, with AAA providing the most extensive access options for users.](#)

⁷ [PAS 78:2006 Guide to good practice in commissioning accessible websites. Developed by the Disability Rights Commission in collaboration with BSI. This PAS \(publicly available specification\) outlines good practice in commissioning websites that are accessible to and usable by disabled people. Production of PAS 78 is a preliminary stage in carrying out a full revision of the earlier standard BS ISO/IEC 8878:1992.](#)

⁸ W3C – World Wide Web Consortium. An international cooperative project to develop improved and standardised online facilities.

⁹ Link Group Business Plan 2009 – 14. Section 2.