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Dacorum Borough Council

Internal Audit Report
Web Accessibility
June 2020

FINAL REPORT

Contents

If you should wish to discuss any aspect of this report, please contact Sarah Knowles, Senior Manager, sarah.knowles@mazars.co.uk or Peter Cudlip, Partner, peter.cudlip@mazars.co.uk

01 Introduction

As part of the agreed 2019/2020 Audit Plan, Mazars has undertaken a review of the Web accessibility controls in place at Dacorum Borough Council to ensure controls have been adequately designed and implemented.   An effective Web presence is a key method for the Council to provide information to clients and also allow clients to access Council services.

We are grateful to the Web Team Leader, and other council staff for their assistance provided during the course of the audit.

This report summarises the results of the internal audit work and, therefore, does not include all matters that came to our attention during the audit. Such matters have been discussed with relevant staff.

02 Background

We are grateful to the Web Team Leader, and other council staff for their assistance provided during the course of the audit.

New UK regulations on the accessibility of websites and mobile applications of Public Sector Bodies came into force in September 2018. These regulations implement the EU Directive on web accessibility and require public sector websites and mobile applications to achieve particular accessibility standards.

Making a website or mobile app accessible means making sure it can be used by as many people as possible.

This includes those with:

- impaired vision;
- motor difficulties;
- cognitive impairments or learning disabilities; and
- deafness or impaired hearing

At least 1 in 5 people in the UK have a long term illness, impairment or disability. Many more have a temporary disability.

Accessibility means more than putting content online. It means making your content and design clear and simple enough so that most people can use it without needing to adapt it, while supporting those who do need to adapt certain elements.

For example, someone with impaired vision might use a screen reader (software that lets a user navigate a website and 'read out' the content), braille display or screen magnifier. Or someone with motor difficulties might use a special mouse, speech recognition software or on-screen keyboard emulator.

People may not have a choice when using a public sector website or mobile application, so it is important they work for everyone. The people who need them the most are often the people who find them hardest to use.

Accessible websites usually work better for everyone. They are often faster, easier to use and appear higher in search engine rankings.

Most public sector websites and mobile apps do not currently meet accessibility requirements and a recent study found that 4 in 10 local council homepages failed basic tests for accessibility.

Common problems include websites that are not easy to use on a mobile or cannot be navigated using a keyboard, inaccessible PDF forms that cannot be read out on screen readers, and poor colour contrast that makes text difficult to read - especially for visually impaired people.

A council may be breaking the law if their public sector website or mobile application does not meet accessibility requirements.

The overall objective of the audit was to evaluate and test how the Council manage the risks associated with compliance with UK regulations on the accessibility of websites and mobile applications of Public Sector Bodies. To support this, we used website validation tools, which test compliance with accessibility standards.

Further detail on scope of the audit is provided in Section 2 of the report.

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03 Key Findings

Our assessment in terms of the design and compliance with the system of internal control is set out below:

Adequacy of System Design	Effectiveness of Operating Controls
Substantial Assurance	Substantial Assurance

Main Findings

Two priority 2 recommendations were raised where there is scope for improvement within the control environment. These are set out below:

- The organisation should address the issues highlighted in the 'Siteimprove' reports as a matter of priority and ensure changes are applied across domains and services consistently. (Priority 2).

- The organisation should address the issues highlighted by the 'HTML Validator Tool' and apply website changes across the domains to improve accessibility. (Priority 2).

Examples of areas of strength

- Every service has a content officer and they have training and documented guidelines in line with the current standards.
- The organisation makes use of recognised tools to assess its websites/content and compliance with standards including Sitemorse and Siteimprove.

Priority	Number of recommendations
1 (Fundamental)	0
2 (Significant)	2
3 (Housekeeping)	0
TOTAL	2

04 Areas for Further Improvement and Action Plan

Definitions for the levels of assurance and recommendations used within our reports are included in Appendix A1.

We identified a number of areas where there is scope for improvement in the control environment. The matters arising have been discussed with the Web Team Leader. The recommendations are detailed in the management action plan below.

	Observation/Risk	Recommendation		Management response	Timescale/ responsibility
4.1	**Adherence to Website Standards** *Observation*: The Council uses Siteimprove (www.siteimprove.com) to help evaluate their adherence to Website standards. They also use the Sitemorse (https://sitemorse.com/index/report-table.html?rt=1663&v=blobs) website to demonstrate where they are in Local Government Rankings, currently 93rd as of April 2020. WCAG 2.0 and WCAG 2.1 are stable, referenceable technical standards. They have 12-13 guidelines that are organized under 4 principles: perceivable, operable, understandable, and robust. For each guideline, there are testable success criteria, which are at three levels: A, AA, and AAA. The Siteimprove accessibility report shows compliance with A, AA, and AAA levels i.e. 100% or where action is needed. Siteimprove only looks at the main public facing website – not the underlying domains. A quick win would be to fix the main website issues and cascade fixes to underlying domains which copy the format of the main website. This would potentially allow the council to fix some of the 'low	The Council should address the issues highlighted in the Siteimprove reports as a matter of priority and ensure changes are applied across domains and services consistently.	2	As recommended, we will address the issues highlighted in the Siteimprove report. Our first priority will be the main websites.	GM – Technology & Digital Transformation October 2020

	Observation/Risk	Recommendation		Management response	Timescale/responsibility
	hanging fruit' and potentially improve its ranking position. *Risk*: Issues not addressed, services not improved or services fall behind standards to available technologies reducing their effective use and benefit.				

	Observation/Risk	Recommendation		Management response	Timescale/responsibility
4.2	**Content Validation tools** Observation: Dacorum also use a free online HTML Validator by World Wide Web Consortium (https://validator.w3.org/). As part of the review we also made use of the tool covering the following sites:- • https://www.dacorum.gov.uk/ Council Homepage • https://www.dacorum.gov.uk/home/coronavirus-(covid-19)-advice-and-updates Covid-19 Updates • https://www.dacorum.gov.uk/home/council-tax/paying-your-council-tax-bill Paying Council Tax Bill • https://www.dacorum.gov.uk/home/planning-development/planning-applications/search-planning-applications Search Planning Applications	The Council should address the issues highlighted by the HTML Validator Tool and apply website changes across the domains to improve accessibility. A new report using the HTML Validator should be run to establish the current position.	2	We will deploy the WWWC validation tool and act on issues highlighted. Once we are satisfied these are resolved we will repeat the exercise until there are no issues revealed.	GM – Technology & Digital Transformation October 2020

- https://eforms.dacorum.gov.uk/EnvForms/Default.aspx?HeadingID=10 Missed Bin Report - https://www.dacorum.gov.uk/home/housing/current-tenant/rent Pay Housing Rent - https://www.dacorum.gov.uk/home/environment-street-care/recycling-refuse-waste/your-waste-collection-calendar Bin Collection Days - https://www.dacorum.gov.uk/home/housing/housing-advice-and-options/apply-for-housing Apply for Housing - https://www.dacorum.gov.uk/home/recruitment Career Applications - http://www.dacorum.gov.uk/home/tools/accessibility-statement Accessibility Page As a result we noted 39 errors and 125 warnings relating to content accessibility in a review run at the time of the audit. Given changes in content occurring regularly this result is an ever changing result and consequently regular reporting will be required to continuously assess content accessibility. Accessibility issues may be because of underlying code making, for example, colour contrast being weak or input controls not compliant (fields such as first name/ last name should be next to an input box rather than in the box itself. Dacorum has an outsourced site (democracy.dacorum.gov.uk) which manages their own content but the labelling is Dacorum as they are hosting on Decorum's behalf. Dacorum should consider requesting website changes to improve accessibility.	

The planning link from Dacorum's website has underlying code issues and therefore there is a. need to discuss this with IDOX who provide the software and would need to manage any change. *Risk*: Accessibility is not effectively improved consistently across websites including those managed outside of the Council's control				

A1 Audit Information

Audit Control Schedule	
Client contacts:	Linda Roberts – Assistant Director, Performance, People and Innovation Ben Trueman – Group Manager, Technology and Digital Transformation Murtaza Maqbool – Web Team Leader
Internal Audit Team:	Peter Cudlip, Partner Sarah Knowles, Senior Audit Manager Martin Baird, IT Audit Director Will Ockendon – Senior IT Audit Manger
Work commenced	16 March 2020
Finish on Site \ Exit Meeting:	7 April 2020
Draft report issued:	4 May 2020
Management responses received:	11 June 2020
Final report issued:	15 June 2020

Scope and Objectives

The review focused on providing an independent and objective opinion on the degree to which the Council manage the risks associated compliance with UK regulations on the accessibility of websites and mobile applications of Public Sector Bodies. The Review will consider the following risks:-

- That users cannot recognise and use the Council's service with the senses that are available to them.
- Users cannot find and use Council content, using different access methods (for example, using a keyboard or voice commands).
- People cannot understand your content and how the service works.
- Content cannot be interpreted reliably by a wide variety of user agents (including reasonably outdated, current and anticipated browsers and assistive technologies).

Testing was performed on a sample basis; and as a result, our work does not provide absolute assurance that material error, loss or fraud does not exist.

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Definitions of Recommendations	
Priority	**Description**
Priority 1 (Fundamental)	Recommendations which are fundamental to the system and upon which the organisation should take immediate action. Major issues for the attention of senior management and the Audit Committee
Priority 2 (Significant)	Recommendations, which, although not fundamental to the system, provide scope for improvements to be made. Recommendations for local management action in their areas of responsibility.
Priority 3 (Housekeeping)	Recommendations concerning issues which are considered to be of a minor nature, but which nevertheless need to be addressed. Detailed problems of a minor nature resolved on site through discussions with local management.

Definitions of Assurance Levels		
Assurance Level	**Adequacy of system design**	**Effectiveness of operating controls**
Good Assurance:	There is a sound system of internal control designed to achieve the system objectives.	The controls are being consistently applied, or any weaknesses identified do not affect key controls and are unlikely to impair the achievement of the objectives of the system.
Substantial Assurance:	Whilst there is a basic sound system of internal control design, there are weaknesses in design, which may place some of the system objectives at risk.	While controls are generally operating effectively, there are weaknesses, which put some of the system objectives at risk.
Limited Assurance:	Weaknesses in the system of internal control design are such as to put the system objectives at risk.	The level of non-compliance puts the system objectives at risk.
No Assurance	Control is generally weak leaving the system open to significant error or abuse.	Significant non-compliance with basic controls leaves the system open to error or abuse.

A3 Statement of Responsibility

We take responsibility to Dacorum Borough Council for this report, which is prepared on the basis of the limitations set out below.

The responsibility for designing and maintaining a sound system of internal control and the prevention and detection of fraud and other irregularities rests with management, with internal audit providing a service to management to enable them to achieve this objective. Specifically, we assess the adequacy and effectiveness of the system of internal control arrangements implemented by management and perform sample testing on those controls in the period under review with a view to providing an opinion on the extent to which risks in this area are managed.

We plan our work in order to ensure that we have a reasonable expectation of detecting significant control weaknesses. However, our procedures alone should not be relied upon to identify all strengths and weaknesses in internal controls, nor relied upon to identify any circumstances of fraud or irregularity. Even sound systems of internal control can only provide reasonable and not absolute assurance and may not be proof against collusive fraud.

The matters raised in this report are only those, which came to our attention during the course of our work and are not necessarily a comprehensive statement of all the weaknesses that exist or all improvements that might be made. Recommendations for improvements should be assessed by you for their full impact before they are implemented. The performance of our work is not and should not be taken as a substitute for management's responsibilities for the application of sound management practices.

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