

WVT disproportionate burden statement

Wye Valley NHS Trust is committed to meeting the requirement to make websites accessible, set out in The Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018 ("the accessibility regulations").

Our approach to carrying out accessibility checks

We've decided to use a combination of methods, as set out in the GOV.UK guidance on deciding how to check our website and in compliance with the accessibility regulations. Detailed checks have been conducted on www.wyevalley.nhs.uk

The process for doing detailed checks includes:

- manual testing based on GOV.UK's guidance on doing a detailed accessibility check
- automated testing using accessibility monitoring software

Our accessibility statement, which can be found here – www.wyevalley.nhs.uk – will be updated to cover problems we found for our website and our plans to fix them.

Disproportionate burden assessment

We believe that our approach to carrying out accessibility checks is reasonable.

However, the accessibility regulations say that we don't need to make all elements on a website accessible, if doing so would impose a disproportionate burden on us.

We've assessed that it would be a disproportionate burden to fix all PDF documents published on this website since 23 September 2018.

We've received no complaints from website users relating to accessibility. While we entirely agree that our website should meet current accessibility standards, at this point in time we don't believe the cost of time, effort and resource to fix all the documents is justified.

We will therefore focus our work in two areas:

1. To ensure that new documents are accessible where they're required for essential services or specifically address the needs of, or are meant for, people with disabilities.
2. Due to age of the website and the software platform on which it is built, there are inherent structural restriction which limit what can be done to meet the required standards. We are therefore commissioning a new website for the Trust.

Documents

As of October 3 2023, there were 1,451 PDFs and 998 other documents on our website (including XLS, PPT, DOC).

Following extensive work we have reduced this significantly to 427 PDFs and 117 other files (Oct 13).

Many of the documents that do not meet current accessibility standards are our Trust Board papers. These are complicated documents that include many detailed tables and typically run to between 100 and 400 pages (average is 252 pages).

Estimated costs

It's difficult to know how long it would take to make every document accessible without first reviewing each one. Potentially, each document would require several hours of work to be recreated in a fully accessible version.

Based on testing a sample of files, converting the documents using Adobe Acrobat pro will take between one and 32 hours per document (depending on length and complexity, plus any required sign-off, or subject matter expert involvement). To WCAG 2.1 AA certification, the hours will be higher.

If we use a conservative estimate of four hours to review and fix each document within scope, fixing all 544 would take nearly 300 working days (based on a 7.5-hour working day at Wye Valley NHS Trust). On the basis of these assumptions, we estimate the cost to our organisation for fixing the documents would be in the region of £35,000-£40,000.

We believe this would be a disproportionate burden on the Trust.

Assessment of costs and benefits

We believe that:

The size, resources and nature of our organisation mean that there are limited public resources available which must be managed appropriately and in the public interest to prioritise the delivery of essential services to the public

The costs of paying for fixing all of the documents on our website would be a substantial burden on us and the public resources we manage

The benefit to users would be limited and their needs can be met in other ways

Therefore, fixing all documents on our main website would impose a disproportionate burden on us.

In reaching this decision, we've considered the following:

Our organisation's size, resources, and nature

Wye Valley NHS Trust is a public body. Its role is to provide health and care services for the population of Herefordshire (around 186,000 people) plus around 40,000 patients from Powys.

Precious public resources are limited for the delivery of these key services.

During 2020-22, we prioritised resources owing to the coronavirus (Covid-19) pandemic, supporting the roll-out of the vaccination campaign and caring for many sick patients.

Redirecting resources away from these important activities would not be in the public interest.

The estimated costs and benefits for our organisation: fixing documents

The vast majority of this work would have little to no benefit to users with disabilities, based on the lack of historical complaints (in relation to the accessibility of these online documents).

The estimated benefits to users

Our users with disabilities will benefit from us making our website and online documents accessible and we have begun undertaking detailed accessibility checks and are working to ensure that new documents are accessible where they're required for essential services or specifically address the needs of, or are meant for, disabled people. This focuses our accessibility improvements where they'll provide the most benefits to disabled people.

However, we don't believe that the limited additional improvements that could be gained from historical document fixes would justify the substantial costs of doing so.

New website

In order to ensure the website itself (not the Documents uploaded to it) meet current accessibility standards, we would have to redesign our website using a different/updated operating system. Costs for this could be as high as £40,000-£45,000.

Despite the significant financial challenges we face, we believe making the website fully compliant is important and a programme of work is underway to secure funding and create our website on a new platform which complies with the accessibility standards.

Our aim is to have this on line in spring 2024.

We believe our resources are better spent investing in a sustainable and accessible website for the future, rather than spending time and resources now converting documents for short-term gain on a website which will never fully comply with accessibility standards due to its age and lack of upgradability.

New patient portal

Work is underway to develop an ICB-wide patient portal which will hold all patient leaflets across Herefordshire and Worcestershire. This will become the go-to location for on-line patient information leaflets.

This will involve converting patient leaflets from PDFs to accessible documents that will meet accessibility requirements.

The intention is that this portal is on line by early 2024.

Work is ongoing to ensure this programme of work is dual tracked alongside the creation of the Trust's new website which will benefit from the online availability of accessible patient leaflets.

This assessment was made in October 2023