Digital Accessibility Policy

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1.0 Introduction

1.1   The University aspires to make digital content and systems as inclusive and accessible as possible. It also has a legal duty to meet relevant regulations in this context, such as the Equality Act 2010 and the Public Sector Bodies (Websites and Mobile Applications) Accessibility Regulations 2018 (the "Accessibility Regulations")

1.2   The Equality Act 2010 includes a general duty to make reasonable adjustments for disabled people (including providing alternative, more accessible formats of digital content available to disabled individuals on request). The Accessibility Regulations clarify and enhance the Equality Act requirements for a digital context and require a more proactive and inclusive approach. A failure to comply with the Accessibility Regulations requirements will be treated as a failure to make a reasonable adjustment, contrary to the Equality Act 2010.

2.0 Purpose of the Policy

2.1   The purpose of this policy is to set out the University of Reading's approach to meeting the relevant legal requirements, and the principles that it expects staff to follow to achieve this.

3.0 Scope of the Policy

3.1   This policy applies to:

3.1.1 all new, updated, and existing digital services and systems that are provided by or on behalf of the University of Reading in the United Kingdom;

3.1.2 everyone that produces documents or content that will be published or made available to others on University of Reading digital services and systems; and

3.1.3 everyone involved in the procurement, management and/or development of a University of Reading digital service or system.

3.2   For the purposes of this policy, a "digital system or service" is any Information Technology (IT) system that is accessed using a browser or on a mobile device and is created for an internal or external audience (for example staff, students, and members of the public). This applies to the administrative interface as well as the user interface.

3.3   This includes but is not limited to:

- websites
- web-based systems
- documents and content hosted on a digital system
- mobile applications.

3.4   A digital system or service is in scope of the Accessibility Regulations if it is funded, developed, or controlled by the University or displays University branding.

3.5   The policy does not apply to:

3.5.1 Any digital system that is not funded, controlled, or developed by the University is outside the scope of this policy. This includes subscription services where the University does not control or manage a system but pays for access to it.

3.5.2 Some types of digital content are not in scope.

3.5.3 Even where a digital system or service is outside the scope of this policy, its accessibility will be considered, and where specifically requested, provisions made for reasonable adjustments or alternative formats.

4.0 Policy statement

4.1   The University will put systems and a framework in place to enable compliance with the Accessibility Regulations and all relevant legislation. It will ensure changes to legislation are considered in a timely manner and review policy and controls accordingly.

4.2   Digital systems will be developed and managed to comply with the Accessibility Regulations, addressing any technical limitations that become apparent.

4.3   The University requires that:

4.3.1 Newly commissioned digital content and services, whether delivered by external providers or built in-house, must meet the required accessibility standard of WCAG 2.2 AA from the outset.

4.3.2 All existing digital content and services will meet at least conformance level 2 standard (AA) of Web Content Accessibility Guidelines (WCAG) 2.2.

4.3.3 All mobile apps will meet at least conformance level 2 standard (AA) of Web Content Accessibility Guidelines (WCAG) 2.2

4.4   Any digital system or service that cannot be made accessible will be referred to MSPB who will act to manage the risk of non-compliance. This may be escalated to other accountable roles for accessibility compliance, or consideration of possible exceptions.

4.5   An owner for each digital content and service will be identified or appointed and that owner will be accountable for the accessibility of that content and service. They will also be accountable for the accessibility information provided via an Accessibility Statement to users of the content and service.

4.6   Staff who provide content must learn how to make content accessible and keep up to date with accessibility standards. Digital accessibility training is a mandatory part of the induction process for all new staff and of continuing professional development for existing staff.

4.7   We will publish and keep up to date digital accessibility statements in a form that meets the requirements of the Accessibility Regulations.

4.8 If something is not in an accessible format, and an alternative format is requested by a user, the University shall provide an accessible format to the user.

5.0 Governance, Roles and Responsibilities

5.1 A governance structure for digital accessibility is outlined below to support the statements set out in this policy.

5.2 Digital Governance Group is accountable for ensuring that the University adheres to The Regulations.

5.3 Digital Accessibility Officer is accountable for developing a suitable strategy and framework to support the University in meeting its accessibility goals and for monitoring and enforcing its implementation.

5.4 Digital Accessibility Officer will be responsible for addressing queries regarding technical compliance with accessibility web standards and for resolving issues where reports of non-compliance with standards are identified across the University. The Legal Services Department will advise and support the Digital Accessibility Officer to resolve issues where incidences of non-compliance with the Accessibility Regulations are identified with the University.

5.5 Accessibility Champion for each School and professional services function will be identified to support colleagues in meeting the accessibility regulations.

5.6 Digital Accessibility Officer is responsible for oversight of all the University's Accessibility Statements and the overall consistency of information provided in them and use of the University's Accessibility Statement Template, and for it meeting minimum legal requirements.

5.7 Sponsor of each digital system and service will be responsible and accountable for the accessibility of that digital system and service, and for creating, publishing and keeping accessibility statements up to date for their allocated digital system and service.

5.8 Digital Accessibility Officer will be responsible for the Creation and maintenance of accessible templates.

5.9 Digital Accessibility Officer will be central point of contact for staff and student requests for an alternative format where what has been provided does not meet the Accessibility Regulations or is required as a result of an agreed reasonable adjustment.

5.10 Cyber & Information Security Group will be responsible for carrying out a disproportionate burden assessment and reaching a conclusion, where Digital Accessibility Officer has determined that there is a case to consider.

5.11 All staff will be responsible for the compliance of any content they produce for a digital system or service, and for attending accessibility training made available by the University and observing the requirements of this policy,

5.12 If you experience any issue, please report it to **WebAccessibilityTeam@reading.ac.uk**

5.13 Digital Governance Group are the owner of the Policy and if required will escalate to Governance

5.14 Digital Accessibility Officer is responsible for overseeing the training, and audits

6.0 Accessibility statement

6.1 All distinct websites authored by the University, all individual modules on the VLE and all purchased third party software and web-based systems must have a published accessibility statement that is compliant with the Accessibility Regulations and guidelines laid out by the Government Digital Service (GDS).

6.2 Each accessibility statement will need to be updated annually.

6.3 The University is responsible for authoring and publishing compliant accessibility statements for all purchased third party software and systems that do not provide their own.

7.0 Exemptions to this Policy and Disproportionate burden assessment

7.1 Exemptions from the position set out in this policy will be approved by the Cyber & Information Security Group.

7.2 The following circumstances may qualify as exemptions from the requirements of this policy:

7.2.1 Where compliance is not technically possible or may constitute a disproportionate burden (see below) due to the nature or purpose of the information resource or service.

7.2.2 Where compliance would result in a fundamental alteration of the information resource or service and not satisfy the original intent.

7.2.3 Where the content is not currently compliant, but efforts are underway to fix the issues by a defined date.

7.3 Exemptions to this policy may be made by submitting an exemption request to be reviewed by Cyber & Information Security Group. Non-compliant information technology must not be purchased or developed prior to receiving an exemption approval.

7.4 The Accessibility Regulations envisage that in a very limited set of circumstances it may be the case that the impact of fully meeting the accessibility regulations is disproportionate for a public sector organisation. For example, if a specific accessibility issue is expensive to fix and the benefit to users is not high enough to justify the provision of resources required. 'Lack of time or knowledge' do not constitute a disproportionate burden and the majority of digital content will be fully accessible.

7.5 Where organisations consider that there may be a case for arguing disproportionate burden, they are legally required to carry out an assessment of the extent to which compliance with the Accessibility Regulations imposes

a disproportionate burden, to consider certain factors and document the decision.

7.6   Cyber & Information Security Group will consider whether properly submitted exemption requests are exempt as a 'disproportionate burden' in line with the parameters established by the Accessibility Regulations.

7.7   All decisions regarding exemptions to this policy will be recorded, shared with the Digital Accessibility Officer and documented in the relevant Accessibility Statement.

8.0   Accessibility training

8.1   The Digital Accessibility Officer will be responsible for overseeing training and where required developing training for appropriate staff. Where appropriate the Digital Accessibility Officer will liaise with other professional services who provide training.

9.0   Compliance

9.1   Failure to adhere to this policy may be an infringement of the relevant legislation, which could result in reputational damage, action by our regulators, legal action and/or financial loss.

10.0   Document control

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1.3	4	DTS	30/01/2024	DGG	05/02/2024		Jan 2026