



Disproportionate burden

Website audits

We've assessed that it would be disproportionate burden to pay an external auditor to do full accessibility audits of our entire collection of websites and partner websites. We will pay for an external audit of our main website in 2025. We will prioritise accessibility audits of our main bristol.gov.uk website, essential service applications and citizen consultation tools.

We are embedding accessibility checks in our procurement process and we will regularly verify that styles, components and patterns in our design system are fully accessible.

Legacy PDFs

Our live website (Bristol.gov.uk) currently has over 5,500 PDF. We estimate that many of these documents are not fully accessible. We will regularly check that our essential PDFs have reasonable structure, tables of contents, headings and images with alt text. Key issues with PDFs include missing title metadata, poor semantic structure, tables without row headers, inaccessible PDF forms and the use of images without alt text.

We use Microsoft accessibility checker and Acrobat PDF Pro to fix accessibility issues with documents where possible but many content authors do not have access to Acrobat Pro so we rely on asking service teams to make their source documents fully accessible.

We have calculated that the cost of fixing all legacy content outweighs the value of making this information accessible and consider this to be disproportionate burden.



We will always prioritise and address the accessibility of PDFs that are part of essential online service user journeys, starting with printable school application forms.

We will review the top 10 most downloaded forms twice a year to make sure they remain up to date with latest accessibility requirements. Our next review will be in early 2025.

New PDFs

The majority of new document uploads are provided to us as PDFs by different service teams. We check these using Adobe Acrobat Pro Accessibility checker and ask service teams to make formatting changes where the documents are found to be inaccessible.

Our team has been trained to be able to make PDFs accessible and offer advice when needed. However, their ability to fix PDFs themselves will depend on the size of the document, its complexity and the team's capacity.

In the lead times that we are given for publishing information it's not always feasible to convert inaccessible PDFs to fully accessible documents, especially when documents are required for statutory reasons or to support business progress and decision making.

Our approach is to check all PDF documents for accessibility and push back to service teams where documents are inaccessible.

Identify input purpose

Our forms are mostly built using several third-party applications, none of which make it possible for administrators to add attribute value pairs to form fields so that the form field can identify what value needs to be auto-filled. We will claim disproportionate burden on this WCAG 2.2 success criteria except in Azure forms, where our developers have the capability to add autocomplete attribute value pairs to form fields.



Session timeout on online forms

The majority of our online forms don't allow people to extend their session once the timeout limit is reached. This makes them harder to complete for our citizens and it prevents users who take longer to fill out online forms from using the online channel. We have added session timeout to our accessibility roadmap for several different online form solutions but do not yet have definitive dates for when this issue will be resolved.

Cost versus value calculations

We have over 5,500 PDFs which include word documents, InDesign strategy PDFs, forms and regular information updates.

We've estimated that it can take our team between one hour and two days to make a document fully accessible, depending on the nature and formatting of the source document and who owns the source document. Work to improve PDF accessibility is shared between a central editing team and service teams so it involves a combination of training time and formatting work. If we assume that the average time to convert a PDF to an accessible format is four hours, then it'd take 23,000 hours to convert our legacy documentation into fully accessible documents or HTML. We estimate that we'd need 12 additional fulltime staff to address the accessibility of all our legacy documents including experts in InDesign, PDF accessibility and PDF application forms.

Type of source document	Time needed to make it accessible
A long Word document missing styles or a long Word document with table of contents, figures and tables that doesn't have bookmarks or tags created from Styles	3 - 20 hours of staff time, 15 minutes – 2 hours of Web Team guidance and assistance
A long InDesign document describing policy or strategy with diagrams	Highly dependent on nature of document. A strategy document could take 1-3 days.



A complex spreadsheet with split cells and missing header rows	1-2 days to split complex tables into multiple simpler tables, add alt texts and header rows
30-40 slide PowerPoint presentation	2-3 hours of adding alt text and checking then fixing reading order issues
A planning document containing maps, architecture plans and drawings	4 hours of checking or adding alt text, creating bookmark tags from headings and fixing nesting issues