

THE GOOD COUNCILLOR'S GUIDE TO WEBSITE ACCESSIBILITY



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ACRONYMS

AGAR	Annual Governance and Accountability Return
ALT	Alternative Textual Description
DPA	Data Protection Act
DPI	Disclosable Pecuniary Interest
GDS	Government Design Service
GDPR	General Data Protection Regulation
HTML	Hypertext Markup Language
NALC	National Association of Local Councils
PDF	Portable Document Format
SLCC	Society of Local Council Clerks
WCAG	Website Content Accessibility Guidelines
W3C	Worldwide Web Consortium

INTRODUCTION AND LEGAL FRAMEWORK

WHAT IS WEBSITE ACCESSIBILITY?

Website accessibility is the practice and application of methods to ensure that a website or mobile application (and the information published on it) is accessible to all users, especially those with disabilities that include, but are not limited to:

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

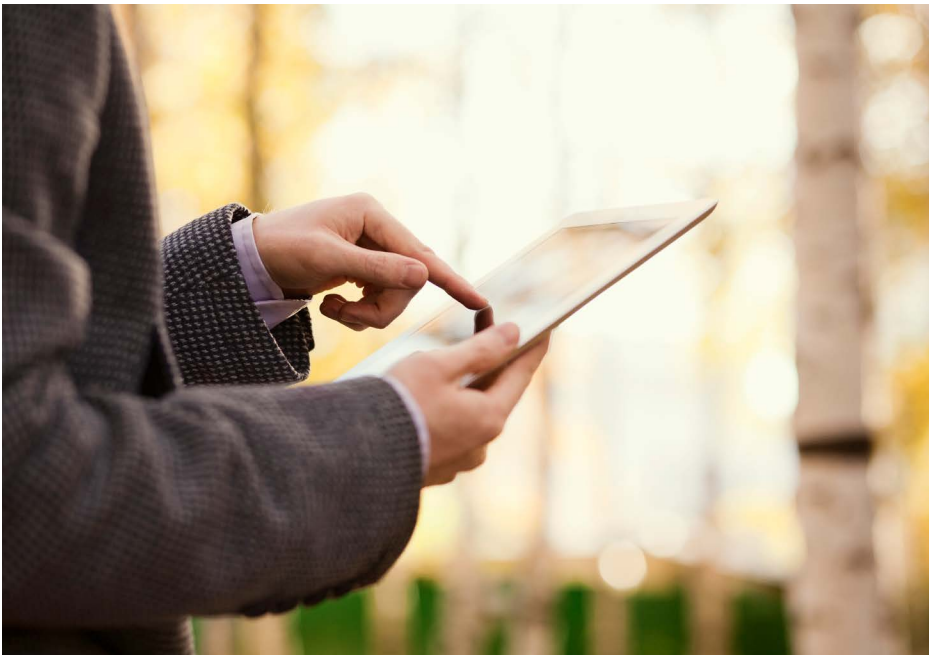


At least 1 in 5 people in the UK have a long-term illness, impairment or disability, and many more have a temporary disability, so this is important to a large number of people. Website accessibility means making your content and design clear and simple enough so that most people can use it without needing to adapt it, while supporting those who do need to adapt things through using assistive technology such as screen readers, adjusting website settings and other hardware and software.

Although all organisations must make 'reasonable adjustments' for disabled people, website accessibility is enshrined in law for the majority of public bodies.

This document outlines what these guidelines are, who is expected to comply with them and how councils should do so. It also explains the simple improvements that can be made to a website to ensure it is accessible to the majority of residents, and highlights other related guidance that it is important to be aware of.

Website accessibility is not limited to just viewing the website in a computer browser but also the mobile phone experience of the website and any mobile application (an 'app'), too.



This guide has been written in collaboration with [Aubergine](#), a company that has a long history of building websites for the local council sector that meet the latest accessibility and compliance rules.

WHAT ARE THE RULES?

Website accessibility has been made a legal requirement for all UK Public Bodies to meet since 23 September 2018. This requirement is governed by the [Equality Act 2010](#) and the [Public Sector Bodies \(Websites and Mobile Applications\) \(No 2\) Accessibility Regulations 2018](#) and these apply to UK public bodies, including all principal authorities, and town and parish councils.

The accessibility of a website is measured according to a set of international standards set down by the [Worldwide Web Consortium](#) (W3C). These standards are called the Website Content Accessibility Guidelines (WCAG) and are updated periodically. Within these guidelines are three different ratings – A, AA and AAA which demonstrate the levels of different measures needed to meet the rules. From October 2024, UK public bodies, are expected to meet WCAG 2.2 AA. This rating is described as:

With the minimum level of support, some barriers [in using a website] will still exist which impact certain groups of users. The criteria at this level establish a level of accessibility which should work with most assistive technology on desktop and mobile devices. Addressing Level AA criteria may impact the look of a page or affect site logic to a greater extent.

Complying with the rules and guidelines for WCAG 2.2 AA involves a combination of some quite technical work that you will need to check your website company adheres to, producing a website accessibility statement, and some simpler measures that are helpful when you are writing and uploading content to your council website. This guide will explain how you can meet both of these and check that your website is compliant.

EXCEPTIONS TO THESE RULES

There are some exceptions relating to parish and town councils that you should be aware of, which are aimed at ensuring rules are proportionate and practical.

Disproportionate burden is the term used when the impact of fully meeting the requirements is too much for an organisation to reasonably cope with. It is important to stress that this must not be used as an excuse to avoid making changes that will make your website accessible. Even if you decide that disproportionate burden applies, you are still required to make 'reasonable adjustments', so you cannot rely on this to avoid making your website more compliant. Government guidance also specifically highlights that a lack of time, skill or failing to prioritise website accessibility, are not acceptable reasons for declaring it a disproportionate burden.

Examples, where disproportionate burden may apply include where a website complies with the previous version of the guidelines and is due to be upgraded within the near future, or where the cost of upgrading a website would take up an unreasonable proportion of your current budget (however

in this case, identifying funding to make your website accessible should be considered in future council budgets). Alongside disproportionate burden, the following exclusions also apply:

- **Parish meetings** are not required by law to comply with the rules on website accessibility; however, where they have a website, it is recommended they still seek to comply with the guidelines so more of their residents can access the information.
- **The Annual Governance and Accountability Return (AGAR)** does not currently need to meet the requirements as they are often scans of forms.
- **Documents provided on your website by third parties** do not need to meet the requirements, unless they come from another public body or organisation that falls within the legislation.
- If **the councillors' register of interests** is maintained using a paper form which is then scanned in, these do not need to meet the regulations. However, it is recommended that these be maintained electronically.



THE STANDARD AND TECHNICAL CHANGES

RECENT CHANGES TO THESE REGULATIONS

New website accessibility rules were released by W3C in October 2023, when WCAG 2.1 AA was replaced by WCAG 2.2 AA. Public bodies in the UK were expected to start compliance from October 2024. These changes were largely technical, and so it is not expected that the majority of town or parish clerks will understand these in any detail, but you should ask your website provider if the following changes have been made:

FOCUS APPEARANCE

Ensuring focus indicators are clearly visible when navigating through content.

FOCUS NOT OBSCURED (MINIMUM AND ENHANCED)

Ensuring content is not obscured when it receives focus, essentially meaning that you should not have buttons, links or other control points obscured by other items, such as overlays, pop ups and cookies notices.

ACCESSIBLE AUTHENTICATION

If your website offers users a login facility or a form submission, you must provide accessible methods for authentication that do not rely solely on cognitive function.

DRAGGING MOVEMENTS

Ensuring functions can be operated with simple gestures without requiring complex dragging movements with a mouse or input device that's physically controlled.

TARGET SIZE (MINIMUM)

Increasing the size of interactive elements to at least 24×24 pixels.

CONSISTENT HELP

Providing help mechanisms on web pages in a consistent location on the pages.

REDUNDANT ENTRY

Reducing the need for users to enter the same information multiple times on a form.

The full WCAG 2.2 standards are available to read in detail on the [W3C website](#).

MAKING AND KEEPING YOUR WEBSITE COMPLIANT

There are many simple publishing techniques that you can, and in some cases, must, follow to make sure your website and the content you publish on it is compliant with the rules.

WRITE CONTENT THAT IS ACCESSIBLE

When writing content for your website, there are some key rules you can follow that will help make sure it is already accessible. Some are related to how you present information, such as text and document formatting, including using headings for document structure. There are more details on these rules in the appendix [Making website content compliant](#), on p.18.

Documents that are downloaded from your website may be available in a range of different formats. The pros and cons of these are discussed in the appendix [Document accessibility, compliance and security](#), on p.22.



CHECKING YOUR WEBSITE IS COMPLIANT

You can check if your website is compliant with the rules using a blend of methods – automatic (using specialised software-based tools) and manual (a human-based check for both experience and real-life usage). However, you should manually check pages to make sure that how the content of the page has been constructed is logical and obvious to the user.

There are a number of website accessibility checking services and tools ranging from free browser-based extensions through to paid-for services by organisations that perform thorough checks of every part of the website and provide a report on the results. Here are some examples, although please note that these tools are not endorsed by NALC or Aubergine and you should perform your own due diligence on them before using:

FREE TOOLS

[WAVE by Webaim](#) Browser extension

[Lighthouse by Google](#) Browser extension

[Siteimprove](#) Browser extension

[Tingyun](#) Web page checker

PAID-FOR SERVICES

[Popetech](#)

[Deque Worldspace Comply](#)

[Tenon](#)

In addition, PDFs can also be checked for their accessibility by using a web browser-based tool, such as Tingtun PAC PDF checker and Adobe Acrobat (full edition).

The government digital service also has a page that provides [advice on doing a basic accessibility check](#).

ACCESSIBILITY STATEMENT

This sets out whether your website is compliant with the regulations. It will demonstrate your commitment to website accessibility by outlining where it does not currently meet the regulations, and the process to go through to obtain any content that is not accessible.

As your website will constantly change with new material, the accessibility statement should be regularly revisited to ensure it is still accurate and up to date. The government has produced [useful guidance](#) and a [template](#) on how to write an accessibility statement.

ONGOING CHECKING

For the most part, once a website achieves WCAG 2.2 AA compliance, checking web pages regularly using the automatic method (software checking tools) will provide a good ongoing way to ensure the website stays accessible. Meeting accessibility compliance is just the start. It is the council's responsibility that WCAG 2.2AA compliance is maintained. It is recommended that you:

- Regularly check the website and its pages using WCAG2.2AA checking tools and services.

- Ensure all documents that are added to the website, such as minutes, agendas, finance documents and any other files that you produce are accessible.
- Perform periodic checks on the website's pages that have changed. Consider creating a reporting document in an Excel spreadsheet that records the URLs in the first column and then the recorded date of checking along with any notes. You can save time by not checking a page that you know has not been edited since the last check.
- Use free browser checking tools.

It is also important that you update your Accessibility Statement with the frequency and method of checking processes as well as when the website was last tested. It is also recommended to ensure you provide contact details in your accessibility statement for those who require additional support with accessing information published by your council.

STEP-BY-STEP CHECKLIST

• SET UP: CONFIRM THE STANDARD

- » Ensure your website is built to the WCAG 2.2 AA level. This is the current legal requirement
- » Prioritise publishing all key information directly on the webpage (HTML) where possible

• PUBLISH: MAKE CONTENT USABLE

- » Use sequential headings (H1, H2, etc.) for clear document structure
- » Use descriptive link text (e.g., "April Minutes") instead of "click here"
- » Add ALT text to all images that convey information

• DOCUMENT AND CHECK

- » Publish and regularly update an Accessibility Statement
- » Use both automated tools and manual checks to audit pages regularly
- » Ensure all council-produced documents (PDFs, Word files) are accessible before uploading

GOVERNANCE AND RELATED COMPLIANCE

FINANCING THE WEBSITE AND ITS ONGOING COSTS

As your council operates to increasingly professional and accountable standards, it's vital to recognise that achieving and maintaining WCAG 2.2 AA website accessibility requires sustained financial planning, not just a one-off fix.

While the initial costs of auditing and upgrading your current website to meet the standard can be significant, clerks and councillors must also budget for ongoing maintenance.

By using a portion of the precept to create a dedicated, multi-year digital compliance fund, your council ensures it avoids the risk of non-compliance and demonstrates its commitment to serving all residents with secure and reliable, accessible public information.

This financial foresight is a necessary component of your governance and transparency responsibilities. It's important to budget not just for the minimum required technical work, but to also cover the costs associated with the ongoing publishing requirements. Treat your website and its accessibility and compliance as a mandatory operational cost, much like insurance or staff salaries.

Integrating these costs into your annual budget and precept shows robust financial management and ensures the council can operate efficiently and professionally without unexpected burdens disrupting services or forcing reactive spending when new compliance deadlines arise.

OTHER ONLINE COMPLIANCE

There are a number of other areas related to council websites, information and digital compliance that are also important to understand. As these have a wider validity and are also crucial to meeting the requirements of the Annual Governance and Accountability Return (AGAR), there is separate information available on these on the NALC website.

TRANSPARENCY CODE

This defines what a council must publish on its website for full transparency as a public body. The rules vary by the size of council.

WEBSITE AND EMAIL DOMAIN NAMES

NALC and SLCC recommend that all councils use a .gov.uk domain name, but even where this is not the case it is now a requirement that councils have a council-owned domain rather than using a personal or free email address, which forms part of the introduction of Assertion 10 as part of the AGAR forms.

More details on Transparency Code and Assertion 10 are on the [NALC website](#).

DATA & PRIVACY PROTECTION

Continued compliance with UK GDPR and Data Protection Act is required for all public bodies.

APPENDICES

MAKING WEBSITE CONTENT COMPLIANT

TEXT

The website must meet WCAG 2.2 AA standards throughout. From how the website is built to the navigation as well as the content, such as the text used on the page must meet the requirements in terms of size, colour, and clarity and must be formatted using HTML that allows the user of assistive technology to have full control over that text so that they can adapt it to suit their needs.

HEADINGS

A fully accessible web page is well-structured with sequential headings throughout the page to add structure to the page content. Adding sequential headings to web pages and documents provides a way of organising the page content so that users of assistive technology can navigate the sections of the page more easily.

A separate article on why headings are vital to accessibility and not just styling tools is available from [Aubergine's Headings Tutorial](#) page.

STYLE FORMATTING

You should ensure that text on a web page is not over-formatted; limited use of bold, italic and capitalisation is recommended and do not use underlines as this infers the text is a link. In addition, it's recommended to have a minimal use of coloured text, using black or very dark grey on a white or very light background where possible.

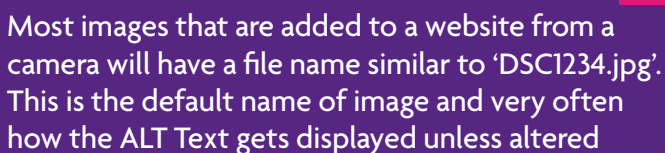
IMAGES

All images must have ALT text (Alternative Textual description of the image) to describe the image to those who have visual impairments. You do not need to add 'image of ...' in the ALT text; a concise, short description is all that is needed.

If you display an image that has lots of embedded text, such as an event poster, you must ensure:

- the ALT text explains it is a poster for the event with the event title, and
- you provide the details of the event on the web page, so that access to the date, time, location and any other event-specific information isn't exclusive to those with sight.

Other images, such as graphics and icons, as well as stock photography, are best to be marked as "decorative" and not given ALT text.



Most images that are added to a website from a camera will have a file name similar to 'DSCI234.jpg'. This is the default name of image and very often how the ALT Text gets displayed unless altered

LINKS

All links on a website, whether to a file, page, or another website must describe the destination of the link. For example, if you are linking to an accessible PDF of the parish council's minutes from April 2024, the link text to the document should read 'April 2024 Parish Council Minutes'. If you are linking to another website, describe the name of the website in the link text, for example, 'the local authority website' – thereby informing the user exactly what or where they will have access to if selected.

- Avoid using vague link text, such as 'click here', 'read more' or other non-descriptive link texts (also known as suspicious links) as this will render the page non-compliant and difficult for users of assistive technology, as they create a barrier to the user.
- Avoid using the full 'https://...' address displayed inline on the page. Many assistive technology systems will audibly read a web address one letter at a time.
- If there are links off to another website that may not be accessible, you should consider flagging this – you are not responsible for the content of that site, but you should inform the user.



TABLES

One of the most difficult elements of a document or page to make accessible is a table.

Historically, these have been used for styling and formatting purposes, particularly on minutes and agenda documents for a consistent way to format the content. The problem is that a table is notoriously hard for users of assistive technology to navigate their way through. A table, even with table headings, often does not give any help or instruction to a non-sighted user as to which direction they must read the content. A table relies on vision to navigate and as such, creates barriers for those that have sight or motor-related disabilities.

A table is only recommended for displaying numerical information and kept within the original MS Excel format or as an accessible PDF produced from Excel so that the user can better interact with the file using their assistive technology.

MAPS

Maps are a visual reference tool and can be used on the website but must not be the primary source of the information they represent. Any information included on a map must be displayed on the website in a textual way so that screen readers and other assistive technology can read the information to the user. Essentially, the information on a map cannot be exclusive to users with sight. For example, if the map is showing the locations of playgrounds in a parish, the playground names, locations and addresses should also be listed on the page.

DOCUMENT ACCESSIBILITY, COMPLIANCE AND SECURITY

Publishing a document in an accessible format is a requirement for all councils and public bodies. If the document originates from, or has been commissioned by, the council it must meet accessibility requirements.

Documents provided by third parties do not need to meet accessibility standards. However, if a council makes this document available on its website, it must ensure there is a clear notice to the user that the document is not accessible and must provide instruction for the user to request the information from it in another, more accessible format.

This process must be defined in the accessibility statement and any documents that are not accessible are likely to have been discovered as part of the assessment process performed prior to drafting the accessibility statement.

DOCUMENT TYPES

The document types described in this appendix meet accessibility requirements.

HTML (.HTML)

This is the native format of most web pages. Provided the web page has been created using accessible formatting and meets WCAG 2.2 AA compliance, anyone who uses assistive technology will be able to access the information on the page. It is important to emphasise the need to have a well-structured page, navigation, correct use of sequential headings along with descriptive link text formatting and a sparse use of text styling.

ADVANTAGES

It is the most accessible format possible. Requires little modification by the user and scales for the mobile experience.

DISADVANTAGES

HTML relies on the website being correctly formatted. Requires potentially large amounts of document text being transferred to a web page.

MICROSOFT WORD (MS WORD) FILES (.DOC AND .DOCX)

These can be added to a website provided they have been checked for accessibility. Microsoft Word has included an accessibility checker tool which is simple to use and provides tips and guidance to address any inaccessible elements a document may contain. It is also useful for checking prior to saving as a PDF(A). If the source document (MS Word) has been made accessible, the resulting PDF will maintain that accessible attribute, too.

ADVANTAGES

High level of accessibility control for users.

DISADVANTAGES

Possible conflicts with newer version file types being added to a website. Requires the user to have paid-for software (MS Word). Has the potential for security and fraud problems as the file can be downloaded from the website and, whilst it cannot be added back to it by the user, it can be edited and distributed by email or on social media for nefarious purpose purporting to be in the name of the council.

PDF FILES (.PDF)

This type of document can be added to a website provided it has been checked for accessibility compliance. The majority of PDFs have been created from an MS Word master and by using the MS Word inbuilt accessibility checker, the resulting PDF will retain the formatting and be accessible. Care must be taken when embedding images, formatting (including horizontal lines), and tables in the MS Word master as they will require extra attention and adjustment in order to retain the accessible nature of the document.

PDFs that have been made by someone else that you do not have the master document for may prove very difficult and time consuming to make accessible and require special software.

PDFs made from free or budget design programmes, rather than those used by professional graphic designers, are almost certainly not going to be accessible. This is a particular challenge for councils that produce newsletters but important to consider when commissioning, as it is unlikely you will be able to upload it to your website knowing it is not accessible. You should consider adding a plain-text version of the document alongside the original.

ADVANTAGES

Once the source document is known to be accessible, it is easy to make and does not require paid-for proprietary software to open. Retains the necessary formatting and can be opened by a PDF reader or web browser, and cannot be edited by the viewer.

DISADVANTAGES

PDFs aren't very usable on a mobile device. They may still contain non-accessible elements whilst purporting to be accessible.



MICROSOFT EXCEL (.XLS AND .XLSX)

Most suitable for presenting financial and numerical information. The MS Excel application contains limited accessibility tools but can be exported into a PDF. For the same reasons as an MS Word document, caution should be taken when publishing an Excel document on the website as it can be downloaded, edited, and distributed without permission.

ADVANTAGES

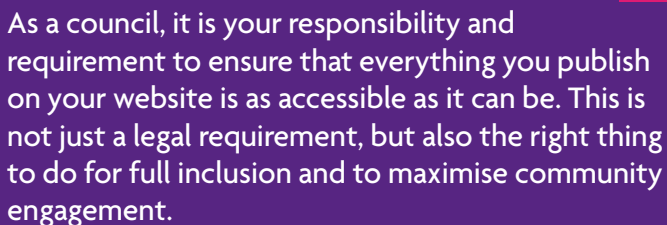
The most suitable application for presenting numerical information in an accessible format. Can be exported to a PDF.

DISADVANTAGES

Possible conflicts with newer version file types being added to a website. Requires the user to have paid-for software (MS Excel). Has the potential for security and fraud problems as the file can be downloaded from the website and, whilst it cannot be added back to it by the user, it can be edited and distributed by email or on social media for nefarious purpose purporting to be in the name of the council.

MICROSOFT POWERPOINT (.PPT AND .PPTX) AND MICROSOFT PUBLISHER (.PUB AND .PUBX)

Neither of these document formats are suitable for adding to the website. They are rarely accessible due to their design-based nature and they require the user to have paid-for proprietary software (MS Office).



As a council, it is your responsibility and requirement to ensure that everything you publish on your website is as accessible as it can be. This is not just a legal requirement, but also the right thing to do for full inclusion and to maximise community engagement.

WHAT DOCUMENT FORMAT SHOULD YOU USE ON YOUR WEBSITE?

For a balance between full accessibility and security of the document, having the information in HTML (the webpage itself) presents the most accessible format. This can be augmented by an additional accessible PDF that contains content that has been produced by the council, such as meeting minutes and agendas.

However, some users with disabilities prefer to have a Microsoft Word format so they can change the formatting to suit their needs. The Council may wish to consider providing this file format upon request as it presents an issue whereby the user can edit the Word document with incorrect or misleading information and, whilst it cannot be updated on the website, it can be distributed by email and social media and present inaccurate information purporting to be from the council.



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Guides in this series include:

The Good Councillor's Guide

The Good Councillor's Guide to Community Business

The Good Councillor's Guide to Cyber Security

The Good Councillor's Guide to Employment

The Good Councillor's Guide to Finance

The Good Councillor's Guide to Neighbourhood Planning

The Good Councillor's Guide to Transport Planning

The Good Councillor's Guide to Website Accessibility