

Disproportionate Burden Assessment

Monmouthshire County Council Website

The assessment relates to:

- Historic PDF and Office documents published before 23 September 2018.
- Large volumes of legacy documents remaining on the council website.
- Documents held for transparency, archive, consultation and record-keeping purposes.
- Accessibility Issues Identified

Some historic documents:

- do not have document titles
- do not contain accessibility tags
- do not provide a logical reading order
- may not be fully compatible with assistive technologies such as screen readers

Benefits of Remediation

Remediating all historic documents would:

- improve access for users of assistive technologies
- improve compliance with WCAG 2.2 AA
- reduce barriers to accessing information

Estimated Burden

Monmouthshire County Council maintains a substantial archive of historic documents across multiple service areas.

A review of all historic documents would require:

- identification and auditing of legacy content
- recreation or remediation of inaccessible documents
- quality assurance testing
- staff resource across multiple departments

The cost in staff time and resource would be significant and would divert resources from delivering current public services and ensuring that new content is accessible at the point of publication.

Alternative Measures

To reduce the impact on users, the council will:

- provide documents in alternative formats on request
- translate into Welsh language
- prioritise remediation of documents required to access services
- ensure newly published documents meet accessibility standards where practicable
- review high-use documents and replace them with accessible versions where appropriate

Decision

Having considered:

- the scale of historic content
- the cost and resource implications
- the frequency with which many archived documents are accessed
- the alternative support available to residents

Monmouthshire County Council considers the retrospective remediation of all historic website documents to represent a disproportionate burden under Regulation 7 of the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018.

This will also apply to the welsh language standards of historic documents aswell.

Review Date

This assessment will be reviewed by September 2027, or sooner if there is a significant change to website infrastructure, resources, statutory requirements or document management processes.