ABI: Thank you very much. We decided to stand and be more active. We have got quite a big panel, quite a big topic, so, first of all, I'm going to ask each of the panel to quickly introduce themselves and where they're from and then we will get into the content.

ALISTAIR: I'm Alistair McNaught. I worked for GSK [?] for years in terms of accessibility specialism. Now I work independently.

GEORGE: I'm George Rhodes. I've recently just moved to the Home Office but I will speak about work I previously did personally.

AARON: I'm Aaron Prior. I was 25 years a civil servant across all aspects of the Government. Particularly relevant to this, I worked on the original Equality Act.

PAUL: Hi, I'm Paul Smyth. I'm Head of Digital Accessibility for Barclays. On a voluntary basis I'm the disability champion for web accessibility supporting UK Government.

ABI: I'm Abi James, I'm an accessibility consultant. I've been involved in many policy aspects about implementing accessibility and assistive technology. As you probably realise most of us are talking from perspectives outside of our employers or from historical positions as well so it will be quite interesting for us. Before we get into content, I will ask you to tell us where you are from. A show of hands, put your hands up if you're from central Government. Local government? Keep your hands up. No, local government. We're all right. Arm's length public sector bodies? We're about 20% there. Universities, education, health sector? We are about 50%. Thank you. About 50% of you might be or definitely are a public sector body or have some responsibilities under things like the Equality Act' anticipatory duty. Put your hands up if you know your organisation has recently published or updated their accessibility statement. Can I ask if there is anybody in here who sells software or browser‑based software or apps or content to public sector, education, health? That's about another 20‑odd per cent. So basically, most of you in the room in your professional lives will be affected by the public sector regulations. I will give you a brief technical outline of what that means before we move on to our panellists. The public sector regulations, it was mentioned a couple of times yesterday, we had a session about carrots and sticks, the regulations are a stick. It was quite nice that at the end of the day we finished with a panel which Paul was on about culture and championing accessibility across the organisation. It is the carrot side of it as well. The public sector regulations came into effect in August 2018. They are UK law. It started off as an EU directive. EU countries may be represented here but it is now UK law and it is staying UK law.

As part of that, public sector bodies have to meet an accessibility requirement, which is defined as perceivable, openable, understandable and robust. It doesn't specify a standard it references a European standard EN31459. So, there is lots of technicalities over the standards but basically saying anything in a browser by next September has to be accessible and any apps for the public facing audience must be accessible by June 2021.

The next requirement is to publish details in an accessibility statement where you say how to comply, if you don't, what you will do about it and if there are accessibility problems for you as the user, who to contact. Yeah! And the third requirement from the regulations, it requires the government to monitor this. They have to take a sample of sites which is specific in terms of who is involved in the sample in terms of different types of organisation, sample that, which by the time it is ramped up in the UK will be it will be 2,000 sites so. A big challenge.

And audits, all reported to the EU, we still have that in the law, ball of the EU countries are doing the same system as well. That is the technical aspects. What I will ask Alistair to do, is to talk about the practicalities of implementing this, and as a follow-up to did Paul to talk from a user perspective from an assistive technology user and supporting communities who talk about accessibility to talk about what this means to get us going. Alistair?

ALISTAIR: There is a story that is important in the way that I approach all of this. When the first rumblings of the legislation came to the ears of college principals and some had not got there yet but a couple of years back, I was saying to somebody and they said that the principal had heard of legislation that was coming in. He said it should not be difficult, just to shut down the VLE, the learning platform. That is the real unintended consequence, I was desperate to avoid. Digital is the solution; it is not the problem. but digital is not done in an accessible way can be a problem. It is important to recognise. Whilst compliance is important culture trumps compliance. If your compliance makes you do things that undermine the culture of giving as many people as good an experience as possible, then you are going in the wrong direction. The first point to make in an educational context, less so in other public sector areas, where you are not face-to-face with the community you are nurturing, the first key point is that the heart of accessibility is as a human. So, taking down the virtual learning environment, taking down the video clips that are not 100% compliant, that could impact on lots of humans badly. So, it's a balancing act.

The second thing, in order to do that it means having risks, having an intelligent approach to compliance it means knowing how to use reasonable judgment, disproportionate burden, those sorts of things. That require risk taking that requires buy in from the top. Too many colleges and universities I have worked with are driven in terms of accessibility by somebody in the middle management with no power over budget, staff training and no power over risk-taking. That is wrong. Must be bought in from the top. To help your senior managers buy in from the top, ask them a simple question: How many students do we want to knowingly exclude? That is what you will be doing if it is not bought in from the top. How many students don't we care if they have a really rubbish experience? Okay. So, that's a good question to ask senior managers. That of course has implications for training and for development. Training in big organisations is very often one size fits all. Because it is not about compliance, it is ultimately about the culture change. Training needs to be role-based, you don't want to go to the marketing team and the procurement team and the library teams and just giving them a list of things to do. You want to engage them in hearts and minds with solving the problem.

So, you need to be helping them with role-specific training that helps them to unpack what their role does to impact positively or negatively on your students, your users. I think that way you can bring them in. I have had more success talking to a team to say, "Let's look at content, I want you four to take the role of this person, you forsake the role of that person and use the content." Quickly they say it was a horrible experience but they know what to do better or do it in a different way, so getting them on board, that training, that role-specific.

Then the last two things, do not assume that at 100% accessibility that all students or users will have benefited as many of the students I have worked with, nobody told them how to benefit from an accessible PDF, Word page, nobody told them the tricks, the benefits it gives them. So ensure that you tell people what they can benefit as a result of your accessibility investments.

And lastly, the core part of the legislation, use it to boast about what you have been able to do to benefit people with what you have done to know what you have not been able to do, so you can have a roadmap and a direction to go in.

ABI: Thank you, Alistair. Paul?

PAUL: Sure, thank you, Abi, Alistair. Building off that, in my mind if I were a college or a [inaudible] sitting in the audience, I would be thinking through, there is inbound legislation, it is saying that the website and the digital services that I need to audit against WCAG, to show the bits that work and those that don't and what I am doing about it, and I need to have a clearer feedback mechanism for people to contact me. To ask for things in a reasonable adjustment. For me it is the feedback mechanism as an organisation, accessibility@organisation.com, whatever it is, it is accessible and such a good opportunity to really get that feedback of how well you are doing. It will be nice to have some of the government folks from GDS or quality and Human Rights Commission to talk it through from their side. I think with purdah, I was getting that confused with that and Pirates of the Caribbean muddled up. So, when people cannot talk about thing, so, yeah but from their side, to recap from yesterday, as a counsel and college making the website WCAG compliant, it is such a low bile currently, it is not about expecting perfection but demonstrating the progress you are improving. The statement says here how to contact us, if you are not getting your voice heard, here is how to contact the central government department with a quality advisory support service, have you heard of them?

ABI: We have about 10 to 15%.

PAUL: From my side it is really important, from the voice of customers to think about disabled citizens or students in this aspect of contacting that organisation if things are broken, if you are still not getting heard, contacting the central body and how they are passing that over to the government digital services, GDS, so again adding into the sampling, the monitoring. The GDR are monitoring a few hundred to show then the relevant resources and to encourage to work with the areas to improve so. It is useful to think through from the voice of customer perspective or where this is a great opportunity around better feedback mechanisms.

And linking from what we heard yesterday with Malin from Norway, this is all about the public sector now but let's be clear, this is coming to the private sector. It is in consultation mode at the moment with the European accessibility act, it is very much in the air with the B word but we can expect over two years the regulation broadening out to the private sector. That is a great thing. For many of the private sector folks in the room it is important to look closely at how people are implementing, embedding and uplifting the accessibility of their services too. So those are the key points.

ABI: Thank you, Paul. I will get you lot involved. This is a question I like to ask when talking of regulations, how many of you in your organisation knows who will deal with accessibility complaints? 30%. That is pretty good going. I am normally 10-15%. How many of you have left a website because of a usability problem or because of an app? 90%. How many left because of accessibility problem? Yep, so there are still probably more people into here who left a website because of the accessibility problem than people having a complaint system within an organisation so. Actually, this is a big change that we have been talking about, compliance but it is about processes to deal with accessibility issues, accessibility testing and accessibility planning. Maybe George and Aaron can talk about it from being inside the large public sector organisations?

GEORGE: From my experience I have done it with the County Council and with university ... I think that I will say something that has been said about 15 times over the last two day, start off with that senior management buy-in, get them to understand the support you need to be able to go out to teams to engage them on that.

Once you have that buy-in, the teams that are rared up, they have had the training, they know what to do about it, to get on with it, you need ways in which to demonstrate that you are doing something about this. Both so that you can feedback to senior management to say: This is what we have done, this is making a real impact, also so that you have got the documentation that you need, all of the facts and the figures for if and when GDS or a member of the public comes knocking with a complaint.

So, from my experience we have done that a couple of different ways to fit the different organisations. Really, it is all around having a fairly well-thought out auditing process, you know, knowing if you are working with your quality assurance teams if you have an sent team that is the Centre of Excellence auditing in your organisation, or if it is with project teams, knowing how they are recording that in a nice and common way, and then knowing how you are collecting all of that together so that you can search all of these audits that you will have to do and to be able to provide the feedback, to point to where the accessibility statements are, to point to minutes of meetings or other documentation that shows where you have had some of those difficult discussions that will inform your disproportionate burden assessments and other additional documentation that you will need.

ABI: People are talking about, we have seen a lot of partially compliance, people are saying is it possible to achieve the standards?

AARON: So, back in 2017, I was with a local authority, we offered to be a path finder with the new regulations and feel our way through. There was a lot of debate done with central Government around was partial doable, was there such a thing as partially compliant? It is one I am more than happy to debate. But for me, I very much took the view of no, it is not. There is a line. There is a pass or a fail scenario in this. We should not be settling for partial. We should be going to the length of the law with this.

GEORGE: I originally agreed with that as Aaron introduced me to much of the accessibility world I have gotten into. We worked at the same County Council previously but I think I have come around to the other side now.

AARON: Oh, George!

GEORGE: Because for many of us, our web estates will be vast. The platforms that we will have are going to be so huge and often contributed to by a devolved list of people, that it's going to be so difficult for you to absolutely say, we are fully compliant. For small websites, for something with only a couple of people you know will ensure that everything is fully compliant, be glad you can say this website is fully compliant but for many of the others, you are probably going to have an ongoing battle where you cannot say with absolutely certainty bear in mind that the document is a legal challenge thing, that you are 100% fully WCAG compliant and no-one can find something wrong with the website.

ABI: And if you say you are partially compliant you have to show what you are doing to prove that. And Alistair, you will have something to say about reaching the high bar of WCAG and the challenges?

ALISTAIR: What it is important it is to recognise that the whole point of communicating your content is to get as many people as possible getting as much benefit as possible. I know that there is a lot of organisations I have worked with local sector organisations where there is one person that puts stuff on a website. That is easy to achieve full compliance you are in an educational setting and perhaps 3,000 staff uploading don't every day and some are part time, sessional, some are not paid for training, there are many other issues where it can be a nightmare.

In that case, it is well worth having almost a progression of expectations, so in a university context or a college context I would expect all of the marketing videos to be a hundred per cent compliant. I wouldn't expect the videos that biology teachers just upload from the field course at five o'clock on a Saturday morning or something, because they've just got back, I wouldn't expect those to all have scene description and I just think I would get them stopping doing any videos then.

ABI: I have an interesting question for Paul. "What happens if you are only partially compliant when your CEO asks?" I know probably from your private organisation experience of actually having to say do the CEOs actually understand all of these nuances, or are they going to want that tick box exercise from it?

PAUL: Certainly, for Barclays, yes, they do and it is about upwards management and making sure that the senior leaders really understand and buy into this and they know it is a yardstick that you and others companies use. Again, when you say that we haven't met this, we're somewhere below this, then there are all these questions and what are you doing to make sure we are back to par to what the minimum legal expectations are. But again, let's be clear, WCAG doesn't mean by hitting 100% perfect, right, there is all sorts of issues that we have to use common sense to override.

ABI: It is about engaging dialogue and about people having knowledge and understanding about what we actually mean by accessibility. One of the concerns people have had with these regulations is whether there is a risk ‑‑ there are two debates on the Slido. Is this risking going to a litigation style like in the US, or because at the moment the system that's in place for monitoring this and enforcing this doesn't provide any system for fining people for non‑compliance, it just goes into the Equality Act, EHRC system? Do we see that there is a risk of maybe more private litigation or do we need a financial stick like Norway has demonstrated can be successful in getting at least senior management to engage when you really need them to push through change?

>> Empowering the end users have important and I've been involved with the National Union of Students in helping them understand the productivity benefits for every single one of their students, not just disabled students but international students with a second language and so on. Now, when you begin to understand what you could be benefiting from and then you go and try to access content online and realise it doesn't have any of those features you have promised will be brilliant, it is a way of creating an upward pressure on tutors, lecturers and managers, et cetera. I think there is real benefit in the end user knowing what they can achieve in order to help managers be persuaded that they will get more complaints if they don't reach it.

>> I think you're right. We have seen legal peril other regulations and it doesn't drive the right behaviours, it really doesn't. This is about generating both interest at the top but a groundswell at the bottom. this starts with employee resource groups coming together, this starts with shared learning. It really needs to push up like that and become a human story. Why does this matter? What are the productivity gains? Make it a much more genuine inclusion and equality issue rather than something to the side.

ABI: Paul, I know you have engaging assistive technology user groups how to engage when it is not successful. How do we know that the regulations are not there and they should expect this higher level of service from the public sector?

PAUL: It is about working with the disability charities and communities to make it clear about where you can go to complain and we know from a clickaway pound or a hand up earlier of 80% or 90% that if you are encountering barriers you will get frustrated and go elsewhere. Yes, the law is coming in and there is the supply side of yes, more organisations are becoming involved but it is more about making it even easier, or as easy as possible for people to say where there are problems and that's going to the organisations and we have these clear central Government bodies who are monitoring things and enforcing things just so that people can be more effective and assertive in where they escalate problems to, which hasn't really happened in the past.

ABI: Okay. We have got some more technical questions and I just to see if there is anyone in the room to comment so far. If we overrun, we are late for lunch! I will keep you short. Has anyone got any comments on the litigation versus compliance, have you got any messages on engaging senior leaders within your organisation? I will make Mark run around. They all want lunch!

Let's move on to the more technical questions. PDFs! How do you encourage lecturers and other members of staff, including public local government and central Government in creating PDFs? How do we get through this technical issue of making more accessible PDFs? It is not necessary you will a low bar, it is a high challenge and skill and requires money and specialist kits.

>> Well, I've done a blog post on LinkedIn called PDF Devil Format. The range of issues you can have, you can make an accessible PDF but it needs to be simple to start with and accessible to start with, and most people don't. Most of the PDFs that take place in an AG institution will come either from power points being turned into PDF which causes all kinds of interesting accessibility issues, or will come from scans of books or third‑party content. I think knowing the accessibility issues is a starting point because even an inaccessible PDF may be accessible for some people and not others. That's where the accessibility statement is important. If you know all of the PDFs you have got on your course were created in a consistent way by your staff then you can say that all of these power points put into PDF will enable you to do this or not enable you to do this. It is a starting point for many people. Generally, within an AG context, try not to use them when you could use something else. With the advent of things like Office 360 where Word documents can be there and accessible on an app, on a phone, there's a good reason for moving away. I wish Microsoft hadn't dropped support for EPUB in Edge. Another conversation.

GEORGE: Don't look at me!

ABI: I will jump in with a technical one. What about these old sites and historical sites? What people really need is time to understand it and to go through it. There are exceptions for historical content. There are exceptions for archive site that are already there. But if it is inactive, it should be accessible, and that means existing sites by 2020. New sites had to be compliant by 2019. New sites were new sites since 2018 or substantially revised sites, don't ask us what that means because nobody can decide. There are technicals. At AbilityNet, we run webinars and there are blogs where we go through the technicalities and questions that arise.

PAUL: Whilst we are waiting, can I ask George, we have had this legislation for a couple of months. If it is a new public sector site, they should have done all of these things and at least have an accessibility statement, do you have a view on how many folks are doing that?

GEORGE: I knew someone would ask me that! So the personal work I did in my free time was I spent some time in between my roles looking now at 1,441 public sector websites which was all local government, fire services, police forces, universities, colleges and NHS organisations to see not only whether they have a compliant accessibility statement at the moment because some people might argue that a lot of those websites are going to be existing, so don't need one yet, but they're all well in use sites and accessibility is not brand new with this new regulation, it is something that they should have been advising on in the first place.

So, I had a look at all of these websites and had a look at whether people have published an accessibility statement or have a good attempt at accessibility advice, where do you go when you find a problem, where they know they have got issues going on at the moment or that kind of stuff, or other tools and things that they have embedded into their website to assist users.

I do have some results from that research. At last count I've seen 110 compliance statements out of those 1,441.

ABI: Just in terms of compliance, there is a specific template you need to follow, there is specific information about the specific wording in some sentences. You can have an accessibility statement but it may still not be correct.

GEORGE: You have to have your list of known issues, what is being done about them. You have to have your contact details. You have to have information on the escalation process and then the support and advice services, and you have to have in one there one very specific question which says, "These websites or mobile applications are fully, partially or not compliant with the regulations." Those are the five things you have to have. That's what I checked for when I was looking for compliance. So those 110 have met that. There are other things as well you need to have in certain cases where you have climbed disproportionate burden or where you have things that are exceptions. All of the other 80 per cent odd, it is 93% or something, it is only about 7% of the websites I looked at had a compliance statement. For the rest of them, you have to look at whether they fulfil some of those or providing other advice that is also useful.

ABI: It is a big long way to go. I will ask a question that is high up on the list. I will ask Aaron to answer it from a technical point of view. Somebody is asking, "Do any HE institutions have a process for quality checking the accessibility of content academics are providing? Who is responsible for it?" Aaron, from an equalities law point of view is it the organisation's responsibility or is it the author's possibility?

AARON: I think from the equalities point of view, it is the organisation. They represent the organisation and it very much sits with them. So, you need to think carefully as well about who that focal point is going to be for those issues. Certainly, what George and I found worked well back in MRG space, the local authority space was tying this together with equality. You normally have very well constructed equality forums and equality managers. One thing we strove towards back in the days of the Disability Rights Commission was to make accessibility and disability part of a whole equalities issue, not something separate. So, to me, it is a logical thing to bring this in as part of the whole equality journey. There is also a duty under the Equality Act for when projects are being undertaken to look at the protected characteristics. For the public sector there is an extra burden under the public sector equality duty so why not bring accessibility in there? It is already similar in nature. Make that part of the consideration from day one and, therefore, bring inclusive design forward. The two work together.

ABI: Getting the technical skills into the existing teams. I will now throw it open. Is there anybody from higher education or from a public sector organisation who has put in place a system to talk about quality, to test any content that's there?

ALISTAIR: From the HE context, I strongly recommend working with students and helping with the equality checkers. As well as the equality elements, there is equality assurance. With Kent we did work for new modules that had to go through a specific quality assurance check. We added details about how to ensure accessibility in the teaching and the learning of this new module.

ABI: Use your internal resource. When I do this, I learn so much doing technical and automatic tests, and with the feedback it feeds into the design process. Large organisation, NHS, local authority or universities will have disabled employee and disabled student groups so getting them involved in testing is a great skill for them. With scientists, also, this is a really good thing to put on CVs so use that in the resource and it something to include the accessibility statement, that you have done the testing. As the standards evolve, with the move to get organisations to include user testing as part of the compliance, so it is not just a checklist, you get more points if you prove you are compliant by testing with users. That is important to keep in the back of the mind there. Is a feeling, this is a risk this will be check box, press a button, there is an automatic check, no red flags and you can say that on the accessibility statement but it is not really true, to say the least. Mark?

MARK: I had the thing about the user resources. I think there is a question about there are some things we may not solve, if there are cuts made in local government, all of the other stuff. It is difficult to see, the question is, how realistic does this feel? I think that the bar is high, you say that many people are failing. Where are the priorities? How realistic is it? If you are sitting in the room, thinking I can't take it on. Where do you start?

GEORGE: I do think it is a priority. Genuinely, we heard yesterday about the Purple Pound, that also has an effect in the public sector, certainly for local government. There is a lot of overlap. We have been doing stuff with libraries and the digital inclusion agenda. One of the things that we see is many users with disabilities who are the most common users of some of our services particularly for benefits and social care and the impact, allowing them to use the services and keep their independence without having additional care from the council or additional visits from workers, those things. It is hard to measure those costs coming back in when it is the IT department doing a fix and the savings are coming from social care. But all of those things save costs and deliver a better quality of service for our customers at the end of the day.

PAUL: Building from that question, from the GDS, and the government, here is what we expect, what we ought to be doing, in terms of the how, fellow panellists are you aware of practical resources that you use or direct others to use to really understand this in more detail and what best practice looks like in terms of who is doing this well?

ALISTAIR: Funnily enough ...

GEORGE: Alistair has thrown me under the bus. Myself, Alistair, [inaudible] and Aaron have contributed to a selection of guidance we have used and tested at the coal face, in the real world on the Lexdis sites. It is lexdis.org.co.uk, that includes all kinds of stuff that our collective know-how has worked through for a lot of different challenges. So, we covered accessibility statement, we covered how we try auditing processes and feeding it back and recording that.

We looked at things for our responsibilities when buying third-party platforms and how to integrate those into our systems. We have done things on accessible events, with ELEs and learning environments and alternative formats and quick accessibility checks, there is a lot of resources. But there is loads out there. If you start Googling some of this stuff, AbilityNet has lots of fantastic resources, Web Aim has lots of fantastic resources, there is lots out there to look at if you just start Googling.

ABI: On the Lexdis site, if you have resources, they are happy to share and Gist Mail have an email group, that is sharing a lot, it is FE/HE focused. It is great for the community. A response to Mark's question about is the bar too high, accessibility is a journey, it is a journey as technology is always changing and we are always on that journey. What I think is good and different to where we may see in other countries, the American 508 that you have to pass, within the accessibility statement you have to say the plan, it is about moving forward, not, I can't do this, this is impossible. It is about we are here; we are going to here and then to here and then aiming as high as possible. The slope may change depending on the different organisations but the bar is not too high to sit down and plan how to improve.

MARK: Can I ask a question, George, when you are looking at thousands of accessibility statement, which plans jumped out at you as being the most useful or valuable or high-quality? Where they have relevance in the context of it. What is a useful thing to put in the plan? To say what you are going to do?

GEORGE: Going off what has been asked for in terms of compliance is a good start. The EU template had two sections. Section 1 was the mandatory stuff, that is the requirements for us. Section 2 was that additional information. So, where you can say we have these tools or this team is particularly good if you are having issues with this service. Anything that can help make that journey easier for the users. When they come to the website, you are having a difficulty, you are looking for assistance, you find the statement, that is where they should be listing this stuff, it goes: We know we have a problem with this service, talk to this team, they are really good at helping you out, then you are sat there feeling like, oh, it is not going to be on the phone to the customer support centre or whatever going through that rig moral. That company has thought about your needs in advance, thought about the challenges and how they are going to help you. That is where you want to be from a good side. It is often easier to pick out the bad ones, to be honest. Many I saw, some were completely blank. A great one that was genuinely a blank accessibility page and at the bottom it said: Was this page useful? No, not particularly! Others where people have tried but maybe the understanding of how to do it in an effective way is not quite there, so they have tried but it has not come off correctly, so I have seen one that was, someone was attempting to make their contact information available in many different languages for the diverse areas that they covered. They provided their little sentence saying here is the contact number and email address in 15 different language, all listed down the page, so you have a page with 15 different languages on it. The second problem with that, is that all of the language, were one big picture of text. That was in 15 different languages. And no alt text, obviously. So, there are struggles like that, or ones that I have seen this one was specifically for blind people. Screen shots with rings drown around the button, no alt text and the tool it was telling you how it uses was not navigating by a keyboard. So, that was a poor one. Many bad examples.

ABI: Thinking about Paul, use the power. It can be scary to the organisations putting up statements especially when they start to think about whether or not they are covered by the regulations but hopefully, I feel as an assistive technology I want to go to any organisation, and say, before I start the process of trying to find if this journal, and I'm being geeky and doing research, are you giving me an HTML version or a horrible PDF with really small New Times text, you think you cannot read that. I will check out your accessibility statement and it is like advertising to the future. That is important when we are engaging with the private sector and widening participation and encouraging that with universities and digital inclusion services, it will not just be about compliance by advertising how inclusive you are to the community.

ALISTAIR: There is another element, it is not just about saying we don't use horrible PDFs in some of the best accessibility statements I have seen and the courses that I have audited in universities, they have said: Because we have done this way you can do X, Y, Z. Most students don't know about that, nor users. So, the two-column PDF for example, if you say you have a lot of PDFs but be aware of how easily you can reflow them, view, zoom, reflow. They look at a column, magnify it and it is still legible. I am working with the University of Kent when George was working with Ben at the University of Kent. We had a student who almost gave up the course as nobody had shown her how to reflow the PDF, she needed high manage any fiction and didn't wish to scroll all over the place. There is no reason why your accessibility statement is not a positive thing, that is helping students with varied and low digital skills, this are good at Instagram and tinder but beyond that, not necessarily. And beyond that it can be positively uplifting.

GEORGE: I have another story on the University of Kent. A student we work with, he was visually impaired. He was German, he was doing international law. Because he came, started doing the accessibility stuff with us, he learned about the services that were there at the university to help him as we made that information available, so he flew, he is now transferred full-time and is staying at the University of Kent as he feels that they did a much better job of addressing his needs. So, it really does become this hook to get people to come to your organisation.

ABI: I will finish off by ...

MARK: I will finish off! I won't be the last one. I don't think you mentioned something about the process, is it clear about the process, what it is going to be you mentioned purdah but will they test sites but beyond that, how much trouble will people be in? That is the elephant in the room. So how much trouble are you in if you don't pass? Does anyone know yet? The fines? The carrot and stick are micro but what are the penalties? That is after the tests are carried out.

ABI: I will answer that up to the point of ESA. From monitoring this is a system from European. This is all European countries; they have to monitor sites. the sample is specific in terms of local, central government but there is an element of that from disability groups. So, they consult with disability groups and ask who to talk to. So, if there are areas, people are saying my GP surgeries, they are covered. Things like that are difficult, they could get more sampled. And in the UK the government office that has responsibility for this, if a complaint is escalated you are in the sample. If there is a portion of you being sampled before, that could change. Then you will be contacted you with your report and tell you the problems, what is not clear is what happens then. Those were talking yesterday with Malin in Norway, there is a timescale process. We don't have clarity on that, think from a disability user group point of view, that hat we need timescale. If you are a student or in a health situation, you will not way two years for an accessibility fix, you have to know it will be addressed quickly.