

Historical PDF conversion: Disproportionate burden assessment

Our site contains a number of PDFs created in previous years, particularly our historic Trust Board papers.

Where these are no longer being updated, we do not intend to recreate them in accessible versions as this would be a disproportionate burden.

In addition, the accessibility regulations don't require us to fix PDFs or other documents published before 23 September 2018 if they're not essential to providing our service.

Scope

This assessment relates to PDF documents no longer in active use only.

We are fully committed to making all current and active documentation fully accessible, as accessible PDFs or HTML web pages.

This has been done by creating a new template for our Board papers, which allows us to produce accessible Board papers going forward.

Benefits

The benefits of making these PDFs into accessible HTML formats would be:

- Historical materials would be fully accessible to all users
- Historical materials would be more easily searchable and indexable

Burden

Our assessment of the burden of making these PDFs into accessible HTML formats is that:

- There are 100 such Board papers, running to over 2,500pages
- Each document would require a number of hours of work to be recreated in a fully accessible version (estimated based on extensive experience of converting

the active documents at between 2 and 30 hours per document, depending on length and complexity, plus any required sign-off)

- Many of the contents of the documents are officially published (e.g. Official or National Statistics) and publishing a new version requires detailed checking, a formal sign-off process, and submitting a new official version to the national statistician
- Many of the documents contain complex elements which are difficult to retrospectively convert, such as detailed tables, graphs, and diagrams

Other factors

Also relevant to this decision are that:

- Interest in these documents is low – few people access them
- The documents do not meet accessibility requirements for a large number of users, although some groups will find them disproportionately difficult
- Of the documents we are proposing would represent a disproportionate burden, requests for additionally accessible versions are rare
- We have and will always assist with accessible versions on request

Assessment

Where documents are no longer in active use, or no longer being updated, there is a high cost in terms of employee hours to convert. These documents are part of the public record, but no longer represent the current position, and interest is limited. We always respond to requests for our publications in different formats on a case-by-case basis, so accessible versions are available on demand, with a short lead-time.

We consider that the costs of converting older documents where there is little evidence of demand would be a poor use of limited staff time, and would represent a disproportionate burden on the organisation in terms of cost.

Assessment date: 13 June 2023