



# INTERNAL AUDIT REPORT

**FROM:** Audit and Risk Manager                      **SUBJECT:** Website Management  
**TO:** Head of People & Communications      **DATE:** 17 January 2024  
**C.C.** Chief Executive  
Head of Finance  
Marketing & Communications  
Manager  
Website Service Manager  
Portfolio Holder (Cllr Harrison)

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## 1 Introduction

- 1.1 In accordance with the Audit Plan for 2023/24, an examination of the above subject area has recently been completed by Emma Walker, Internal Auditor, and this report presents the findings and conclusions for information and, where appropriate, action.
- 1.2 Wherever possible, findings have been discussed with the staff involved in the procedures examined and their views are incorporated, where appropriate, into the report. My thanks are extended to all concerned for the help and cooperation received during the audit.

## 2 Background

- 2.1 Website Management refers to the processes involved in maintaining and developing the Council's website to ensure that it is relevant, up-to-date, accurate and accessible.
- 2.2 The Warwick District Council (WDC) website is managed by staff within the Media team; however, there are content authors and editors across all Council departments.
- 2.3 The WDC website was recently ranked among the most accessible local authority websites in the country, coming thirteenth nationally.

## 3 Objectives of the Audit and Coverage of Risks

- 3.1 The management and financial controls in place have been assessed to provide assurance that the risks are being managed effectively. It should be noted that the risks stated in the report do not represent audit findings in themselves, but rather express the potential for a particular risk to occur. The findings detailed in each section following the stated risk confirm whether the risk is being controlled appropriately or whether there have been issues identified that need to be addressed.
- 3.2 In terms of scope, the audit covered the following risks:
1. Potential fines due to breach of legislation.

2. Failure to comply with key legislation e.g., accessibility legislation or GDPR.
3. Loss of site/website becomes unavailable.
4. Inaccurate data on website providing incorrect information and advice to the public.
5. Risk of not meeting the Digital Strategy.
6. Site not maintained to expected quality.
7. Risk of site being difficult to use or navigate/site not 'mobile friendly'.
8. Inappropriate access to website by cyber-attack, unauthorised employees etc.
9. Loss of IT and records.
10. IT software or hardware failures e.g., corruption, software bugs.

3.3 A 'risk-based audit' approach has been adopted, whereby key risks have been identified during discussions between the Internal Auditor and key departmental staff. The Significant Business and Deputy Chief Executive Risk Registers have also been reviewed.

3.4 At the time of the audit, these risks, if realised, would have been detrimental to the Council with regards to meeting the internal 'Services' element of the Fit for the Future Strategy. The Council has a duty to focus on customer needs, continuously improve processes, and increase the digital provision of services.

## 4 Findings

### 4.1 Recommendations from Previous Reports

4.1.1 There were no recommendations arising from the previous report.

### 4.2 Financial Risks

#### 4.2.1 Potential Risk: Potential fines due to breach of legislation.

The accessibility of the Council's website must comply with both the Equality Act 2010, the Web Content Accessibility Guidelines 2.2, and the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018.

WDC have a specific Website Accessibility Policy in place which outlines any measures to be taken in order to broaden access to the Council's website. The policy should be reviewed every two years and outlines the user groups that should be consulted during any major development of the website. This includes users with visual impairments, mobility issues, cognitive difficulties, elderly users, and users who are hard of hearing.

**Recommendation – The Website Accessibility Policy should be reviewed and updated where necessary, as this has not been performed since September 2020.**

The website was last tested in January 2022 by AbilityNet. The website is also subject to an external audit every two years, with the next external audit due to take place in January 2024.

In order to comply with GDPR, the majority of information relating to officers in the Leisure, Housing and Contract Services teams, such as phone numbers and email addresses, has been removed from the website.

**Advisory – Consideration should be given to removing all officer details from the website.**

SCULPT is a set of guidance created by Worcester County Council on how to create accessible documents. It includes guidance on structure (headings and styles), colour and contrast, use of images, links, Plain English, and tables. Each section provides Microsoft support instructions on how to find and apply accessibility features and provides reasons as to why these should be applied. A SCULPT checklist is also provided to ensure that all content meets this format; a link to this guidance is accessible to all content editors through the Intranet.

The Website Services Manager (WSM) subscribes to newsletters and receives accessibility regulation updates from Jadu (the website supplier), Monsido, (the quality control software), and the Government Digital Services blog. The WSM is also part of several local government forums and follows relevant website and government accounts on social media, where updates or changes to accessibility regulations are discussed.

The Intranet is linked to several advice pages from W3C (The World Wide Web Consortium) including an introduction to web accessibility, an accessibility in government blog, the A11y project, a Silktide training video on new UK accessibility law and a checklist to help officers avoid common accessibility errors. A comprehensive guide to digital accessibility is also available to staff through the Intranet.

**Recommendation – The link to the Government Digital Services training exercise no longer works and therefore should either be removed or updated on the Intranet.**

The government accessibility guidelines outline the steps to be taken when formulating accessible documents including format, language, structure, alignment, font, colour, shape, footnotes, and PDFs. A number of pages from the Council website were investigated by the auditor to ensure that they met government accessibility guidelines. All ten pages were in HTML format and written in simple language. Where applicable, acronyms, abbreviations and technical terms had been explained. In only six pages, however, were the sentences at a length of twenty-five words or less. All pages were written in a sans serif font, above size twelve. No pages contained all caps text or italics and all pages had left aligned text. No pages used colour or shape to show meaning, nor did they use images containing text, other than one page which specifically required a map. Footnotes were avoided in all ten cases and bullet points, numbered steps, and subheadings were included on all ten pages. In three applicable cases, PDFs were published as downloadable documents and a link to the PDF specified the size and content of the document.

**Recommendation- Web authors should be reminded to make sentences twenty-five words or less, where possible.**

**Recommendation – Staff should be reminded to check hyperlinks, as several links were found to be broken on the website.**

Jadu, the Council's website supplier, provide a Content Management System (CMS) which allows web authors to edit content. The CMS provides a readability score feature which scores the Council's webpages based on how simple they are to read and understand. Ideally, all webpage content should be aimed at a reading level of 9-11 years old.

**Recommendation – Staff should be reminded to check the readability score of their content and edit content where appropriate.**

A guide exists on the Intranet, which aligns with the government accessibility guidelines. This outlines what should be included on the Council website. Most WDC website visitors arrive at service area pages straight from Google. It is, therefore, vital that service area pages are clear, simple, and up to date. Web authors are also advised to ensure that web content is well written, and that content is organised around customer's top tasks. The Council guidance includes topics such as organising information on a page, using specific dates, using straightforward, objective language, including keywords in main page content as well as titles and descriptions, adding images where they will help customers, attaching documents as PDFs, ensuring written content is concise, scannable, and objective, using bulleted lists and using headings and subheadings to show the structure of a page. The guidance uses both poor and good quality examples to demonstrate to editors how content should be laid out; there is also a list of things to both include and avoid when designing content.

#### 4.3 **Legal & Regulatory Risks**

##### 4.3.1 **Potential Risk: Failure to comply with key legislation e.g., accessibility legislation or GDPR.**

Stakeholders are given opportunities to provide feedback on the accessibility of the website. If users find issues where the website does not meet accessibility requirements, there is a specific website feedback form that they can complete or they can contact the WSM. If customers are not happy with how WDC respond to feedback, they can contact the Equality Advisory and Support Service (EASS). Feedback on accessibility issues is provided by audits from AbilityNet and Gov Digital Services. Regular accessibility scores are provided in the Silktide accessibility rankings as well as through weekly updates from Monsido. There is also a language tool built into browsers that recognises issues with spelling, grammar, and format; however, this is not part of the Jadu system.

**Advisory – Consideration should be given to recommending that all content editors/authors have a language tool installed or have this built into the CMS.**

The non-accessible content section of the website shows a full listing of known issues with the web pages that may affect users with disabilities. This is visible through the Council's Accessibility Statement. The issues are as follows:

- Some animated content cannot be paused, stopped, or hidden.

- Some video content may not be fully accessible in terms of captioning and provision of transcripts and audio descriptions.
- Most older PDF documents are not fully accessible to screen reader software.
- Progress cannot be saved in some partially completed online forms.
- Form pages have a twenty-minute timeout, and progress is lost if this is reached. Forms have been purposely built to have short pages to attempt to avoid this issue.
- Online maps are not fully accessible.

Customers can put in an accessible content request if information is needed in PDF, large print, easy read, audio recording or braille. Accessibility regulations do not require WDC to fix PDFs or other documents published before 23 September 2018 if they are not essential to providing its services. Furthermore, live video is exempt from accessibility regulations and does not require captioning.

**Recommendation – The Accessibility Statement should be updated, as this has not been reviewed since 3 March 2022 and still refers to 2022 deadlines.**

Customers are made aware of how their data is stored and used at multiple points throughout the website. A link to the WDC privacy notice is included at the bottom of each webpage; individual service privacy notices are also available to view. The privacy notice highlights why WDC need personal information and that the Council can collect and use personal information if needed for law enforcement purposes. When WDC asks for personal information, the customer will be informed:

- How their information will be used and the lawful reason for doing this.
- Why it is being collected.
- Who it will be shared with and whether information will be shared or used outside the EU.
- How long it might be kept for.
- What their rights are and how to use them.
- How to complain if they think that their personal information has been used wrongly or unfairly.

Customers are given the right to access their personal information, although they must complete a Freedom of Information request for this. Customers can also have data rectified if inaccurate and personal information can be deleted if it is no longer needed or when information has to be deleted by law. The service uses a six-month data retention policy; any webform data past this date is wiped.

#### 4.4 **Reputational Risks**

##### 4.4.1 **Potential Risk: Loss of site/website becomes unavailable.**

The website is afforded a section in the Emergency Planning Policy and the WSM has attended Emergency Planning meetings. The WDC website provides an information resource for district residents on emergency planning, business

continuity and flooding. The web pages are updated and reviewed as necessary in order for them to remain a suitable source of information. Currently the WDC website is being utilised to promote business continuity management awareness and links to the Coventry, Solihull & Warwickshire Resilience Team website for further information.

The WSM advised that the Eggplant software monitors server performance; it primarily checks the download speed of the website and will send automatic emails to the WSM if the website goes down. The website does have to occasionally be taken down for maintenance. Upgrades or server maintenance are advertised through the website as announcements through a banner on all pages. If smaller interruptions are planned, only the specific pages due for maintenance will announce the periods of downtime. Reboots are undertaken automatically overnight once a month; however, the WSM advised that the website is rarely down, with uptime working at approximately 99.8% over the last year, according to Eggplant.

#### 4.4.2 **Potential Risk: Inaccurate data on website providing incorrect information and advice to the public.**

There are approximately 117 content authors who the WSM will provide administrative support to in order to keep the website customer friendly. A list of content editors can be found on the Intranet.

There are several pieces of procedural guidance on the Intranet for content managers regarding accessibility, web content, headings, formatting, bullet points, Plain English, links, and style guides. The Corporate Standard is to produce everything where possible in Plain English; acronyms and jargon must be stripped out and wording put together in short sentences. Guidance on the formatting of pages has been produced for content editors. This guidance is to help ensure that headers, bullet points and text formatting is all displayed accurately and as intended.

There is an approved style guide in place for WDC communications. This is a working document and must be adhered to for all internal and external communications to ensure consistency. This contains guidance for a wide range of topics including acronyms, apostrophes, homophones, hyphens, logos, and punctuation. All procedural information is located under the 'How Do I – Website' page on the Intranet. There is a link to the Jadu manual on the Intranet which provides users with a general overview on how to perform tasks within the CMS.

Staff within each service area are responsible for making sure that content remains appropriate, although the WSM will often remind staff to ensure that their content is up to date. The WSM advised that new users are given a training session on how to navigate the CMS and all users can be provided with one-to-one training if required. Training notes relating to specific sections of the CMS have been uploaded to the Intranet.

Website authors are split into two main groups; those who can create content and those who can publish content. Those with publishing access have to review content before it goes live on the website. Some teams have officers who are

both authors and editors, depending on their seniority within the organisation and their user experience with the system; people with experience of the CMS are given jurisdiction to immediately publish items. The CMS displays a list of tasks for reviewers to complete, where a document or webpage has been updated and needs approval before going live on the website. Staff can opt-in to email alerts when they are required to approve an item; this also notifies authors when an approver has reviewed their work. Once a page has been set for approval, web editors can either make suggested changes, edit the document, or simply approve it. Any changes or updates to website content, including policy documents, are reviewed by the relevant approver to ensure that any changes to Council processes are accurately reflected on the website.

Several updates to website content were investigated by the auditor to ensure that they had been approved by an appropriate web editor in a timely manner. In all fifteen cases, updated content had been approved by the appropriate web editor before going live on the website. Fourteen of the fifteen cases sampled were approved on the same date that the content was edited; the remaining case was approved the following day. There is, however, nothing to prevent content being both uploaded and approved by those with web editor access.

**Advisory - Consideration should be given to ensuring that web editors cannot approve their own content changes.**

Spelling, broken links and other content issues are scanned continuously for errors. There is also server monitoring software in place that continually checks server health.

Once events have passed, they will disappear off the website but still show through hyperlinks. Historic items are automatically archived but can be found through the website search engine; these will not, however, show up on future events pages. The CMS displays news items that are still live on the website and those that have been taken down. Information such as Fees and Charges are also updated and uploaded annually.

**4.4.3 Potential Risk: Risk of not meeting the Digital Strategy.**

The WSM advised that the new Digital Strategy is still a work in progress; this is being developed by the Head of Customer & Digital Services, who advised that it will be completed as part of the new Corporate Strategy. An update on the Digital Strategy was chased by the Overview and Scrutiny Committee on 1 November 2023. The current plan is to have the Digital Strategy ready by February 2023, to coincide with the Change Programme. In terms of the website, there are several key themes which will be present:

- Migration of the current CMS to a hosted platform. That migration will entail upgrading the design template of the website.
- Introducing a CRM (Customer Relationship Management) to bridge the case management gap between service delivery and the website forms.
- Migrating the forms to a hosted platform.

WDC use web services such as Google Analytics and Crazy Egg to collect information about how people use the website, although this information will

only be collected if cookies have been accepted. Google Analytics holds information about the pages on the site that are visited, how long people are on the site, how they got there and what they click on during their visit. This uses real-time statistics to show the most popular pages and news items. Crazy Egg keeps a record of what people do on specific web pages, such as how often a link is clicked or how far down a page people will scroll. Crazy Egg can carry out usage pattern assessments, traffic analysis, advertisement performance assessments and A/B performance testing, a method of comparing two or more versions of a webpage against each other to determine which one has better response. Cookies placed by Crazy Egg do not include personally identifiable information such as names, telephone numbers, e-mail addresses or mailing addresses.

WDC use virtual cookies to help keep a log of visitors to the website; no personal information is collected. Customers can reject the use of cookies but may be asked for information again the next time that they visit the website. The WDC website includes Test Cookies which determine whether a user's browser accepts cookies:

- Jadu\_cc cookies keep people logged in if they log into the site.
- userColourscheme, userFontchoice, userFontSize and userLetterspacing re-set if the website user settings are updated, so the website can apply customer preferences when browsing across multiple pages.
- ASP.NET\_SessionID cookies are necessary for the applications to work as they hold information when the user moves between pages. They are cleared when the user leaves the application.
- PHPSESSID cookies collect information about how visitors use a website, for instance which pages visitors go to most often, and if they get error messages from web pages. These cookies do not collect information that identifies a visitor. All information these cookies collect is aggregated and therefore anonymous. It is only used to improve how the website works.
- \_C4AP, \_C4AS cookies are part of Click4Assistance, a feature which allows customers to chat to officers in real-time. The cookies are used to identify if the visitor is new or returning and includes historic activities such as when or if a chat has started, hotspot hits, or if conversions have occurred.
- ASP.NET\_SessionId SX\_X cookies are part of Smart Survey and are used to keep track of a respondent's progress in a survey.

Website statistics go to both the WSM and the Media team. These are mainly based on the number of hits that the website has received or certain trends which can be boosted. Every month the Media Team collates and analyses the coverage the Council has received through press, social media, and e-marketing activity. Monthly media stat reports include the number of visits to the website compared to the same month the previous year. Overall statistics for 2023 are at present 55% for customer satisfaction and 47% for task success. There have been 732,159 website sessions since the new analytics were installed in June 2023. Media team meetings are held every month in which statistics are analysed; key figures such as satisfaction and success rates go to SLT.

The Monsido quality checking software scans the website every five days for broken links, accessibility issues and spelling mistakes. A GOV accessibility audit



was conducted last year to check website breaks; the website is due another GOV accessibility audit in 2 years.

#### 4.4.4 **Potential Risk: Site not maintained to expected quality.**

There is a contract in place with Jadu Creative Limited who design the website. The contract commenced on 18 August 2021 and is not due to expire until 17 August 2024. Contract expenditure has amounted to £38,400, leaving only £1,600 left to spend out of an approved budget of £40,000.

**Recommendation – A discussion regarding the contract spending limit should be held with the Procurement team.**

Jadu is, in effect, the CMS which is built into the website software. This system does not, however, link to Microsoft Office. The WSM has raised this as a desirable feature but, at present, accounts have to be created manually in order to access the system. Staff are able to reset their own passwords and do not require the WSM for this.

**Advisory – Consideration should be given to linking Jadu to staff Microsoft Office accounts.**

Staff are able to switch between the WDC website, and the Royal Pump Rooms and Spa Centre websites if required, although the content for these sites is dealt with by the Arts team.

The XFP-Paybridge software connects webforms to the WDC payment system to allow payments to be taken directly within a webform. This is currently being pilot tested on forms and if successful will be rolled out into the Licensing pages. Instructions on how to set up an online payment using Paybridge with a Jadu form are available on the Intranet to staff.

The CXM system is not currently in use, but the Head of Customer & Digital Services is working on trying to enable this. This will be aligned to a CRM so that customers can access all platforms under a single sign-in. This would enable customers to track forms and communicate with back-office systems, although this project would need to be led by SLT.

The notifications through Jadu have not been updated for four months. However, this is due to issues with the PHP not working with the Council servers (general-purpose scripting language geared towards web development). The Application Support Analyst is working on trying to link the PHP to the server software, as without this, new patches in Jadu cannot be updated.

The website works on categories which determine where the pages sit on the website. Pages can be live on the website and visible on the navigation pages, although editors can turn these off if desired. The Jadu Category Builder shows child category access, where for example, 'Education' would be the main category page and then 'Schools and Colleges' would be the child category page; this means that there can be multiple pages under the same section.

Users are grouped together depending on workflow, meaning that officers in the same teams with access to the CMS are grouped together; these users can then collaborate together on pages if desired. The WSM advised that they hold monthly meetings with the Jadu support team and have constant access to the Jadu Ticket Hub where issues can be raised if needed.

There are no KPIs in place as such, but the Media team do monitor the number of form completions, website satisfaction and website success rates. The criteria for determining accessibility success are:

- Task completion rate
- Degree of completion, error rates
- Number of keystrokes/clicks
- Time taken
- User satisfaction/feedback on each task

Pop-up surveys are used on the Council's website to determine the percentage of people satisfied with the website; this appears as a link at the bottom of the webpage and as part of webform receipts. One of the outcomes of a previous external audit was to increase the number of people filling in feedback forms - the team now use Smart Survey to track this.

#### 4.4.5 **Potential Risk: Risk of site being difficult to use or navigate/site not 'mobile friendly'.**

An Introduction to Web Accessibility and the W3C standards are highlighted to content editors through a video on the Intranet. Microsoft Word also has a built-in accessibility checker which can be used before documents are uploaded in PDF form or to the website. The guidance on the Intranet regarding making content accessible includes government advice on the dos and don'ts of poster design, as well as public sector accessibility requirements. There is also guidance from W3C on making audio and visual media accessible, as well as the benefits of using HTML instead of document-based forms in local government.

There are several tools located on the Intranet with which users can test their content, including the Wave Web accessibility evaluation tool and colour contrast checker. The website is structured in a logical way with page supplements clearly marked. These are links which appear to the side and at the bottom of the main webpage content; web editors can add or remove related links here such as adverts or contact details.

The WSM advised that webforms struggle to interact with back-office systems. Forms under CIVICA Open Revenues and Fly-Tipping reports generate work items in the relevant back-office work queues. However, the WSM advised that it would require far too many man hours to get all webforms interacting with the different Council systems. The Head of Customer & Digital Services is trying to work on this as part of the Digital Strategy. Jadu does allow editors to track received forms and payments through the website. As part of the contract with Jadu, WDC are trying to develop a customer management system which will send web forms directly to one back-office system; teams will then be able to manage webforms in their relevant software.

The website used to speak to the various Council social media platforms; however, it was decided to turn off automatic posting so that the Media team could control the quantity of information being displayed on the website. The Media team add all press releases to the WDC website, making them searchable online and enabling them to be circulated via social media channels. Some press releases will be added to the website news on the homepage.

The website is built in such a way that all information and functionality can be accessed regardless of which type of device is being used. The WSM reviews changes to web browser versions to ensure that the website remains compatible. Website responsiveness is tested and flags any issues in Monsido if something is not working correctly; working on various devices is part of the accessibility guidelines. As a result of this, the WSM conducts personal testing and has the majority of the main browsers installed (Chrome, Edge, Firefox). The WSM also performs iOS, Safari, and Android testing. Jadu, as the main website designer, will ensure that the site is responsive and works across browsers. Website visitors can view the website in both portrait and landscape orientation on mobile devices. According to Google Analytics, approximately 73% of users access the WDC website on a mobile device, with 23% on desktop computers and 4% on tablets.

The website allows users with impairments who use assistive technologies to access content. Visitors to the website are able to change colours, contrast levels and fonts. Customers can also navigate the website with a keyboard, zoom in up to 300% without the text overlapping for most content, and bypass repetitive menu links via a 'skip to content' link on all pages. Customers can navigate most of the website using speech recognition software and listen to most of the website using a screen reader. It should be noted that the website is approved by the Plain English campaign.

## 4.5 **Fraud Risks**

### 4.5.1 **Potential Risk: Inappropriate access to website by cyber-attack, unauthorised employees etc.**

There are approximately 117 members of staff with access to the CMS. The CMS provides a list of who has web editor access and who has web author access. Control is locked over the pages that individual users can edit, for example users from Building Control cannot edit a page related to Licensing. There is also an option to password protect pages if required. The CMS leaves an audit trail through the admin statistics page which shows who has logged into the system and the content that they have edited.

The WSM advised that he receives no formal notification of leavers or staff role changes and, as such, there is no formal process of removing or amending user access. A yearly review is, however, performed by the WSM, where officers no longer working at the Council have access to the CMS removed. A list of CMS users was investigated by the auditor to check that they were on the current WDC Establishment and regularly accessed the CMS. In all fifteen cases, users were on the current WDC Establishment. Ten of the fifteen users sampled had regularly logged into the CMS to update, edit, or approve content; five users had not accessed the CMS in twelve months.

**Advisory – Consideration should be given to disabling access to users who have not logged into the system for over twelve months.**

Officers wishing to request access to the CMS must complete an access request form.

**4.6 Other Risks**

**4.6.1 Potential Risk: Loss of IT and records.**

The service subscribes to Try My UI - software that user-tests any website developments. User testing is performed to ensure that hyperlinks work, and page loading times are efficient following major upgrades. This is done through both the live site and a second site which looks identical to the CMS. The purpose of user testing is to locate any errors so that they can be fixed, ensure that the system meets the business requirements of its end users and improve any existing pages. The WSM works through a checklist to ensure that a number of patches work on the live website, including homepage displays, text, images, linked files, downloads and webforms; the Spa Centre and Royal Pump Rooms websites are also tested in this manner.

Staff have the ability to preview pages before they go live. Any issues are sent back to the CMS to correct, for example there is currently an issue with the privacy statement toggle on the webform instructions if linked through meta data. Any work tested through the live site can be exported and directly imported into the live CMS. Regular usability testing is carried out with the public to highlight any issues on the website. Core tasks are performed and tested on the site to ensure all users can perform them successfully and efficiently. These are also tested after major redevelopments and during accessibility or usability audits.

In the event that the website goes down, ICT have a single page ready to upload on the server that highlights emergency contact details. The CMS allows editors to track changes on previous versions of webpages, meaning that if page content got completely deleted during the editing process, it is possible to perform a rollback and restore previous versions of the website.

**4.6.2 Potential Risk: IT software or hardware failures e.g., corruption, software bugs.**

The CMS does not require two-step verification, as the URL is hidden to the public. This means that officers have to be on the corporate network in order to access the system. This stops phishing or brute force log-in attempts.

**5 Summary and Conclusions**

5.1 Section 3.2 sets out the risks that were reviewed as part of this audit. The review highlighted weaknesses against the following risks:

- Risk 1 – The Website Accessibility Policy is out of date; links on the Intranet may not be updated; broken hyperlinks exist on the website; sentences may be too lengthy or not aimed at the correct reading age.

- Risk 2 – The accessibility statement needs updating.
- Risk 6 – Contract spend is approaching its limit.

5.2 Further 'issues' were also identified where advisory notes have been reported. In these instances, no formal recommendations are thought to be warranted, as there is no significant risk attached to the actions not being taken.

5.3 Although the review highlighted some weakness, in overall terms we can give a SUBSTANTIAL degree of assurance that the systems and controls in place in respect of Website Management are appropriate and are working effectively to help mitigate and control the identified risks.

5.4 The assurance bands are shown below:

Level of Assurance	Definition
Substantial	There is a sound system of control in place and compliance with the key controls.
Moderate	Whilst the system of control is broadly satisfactory, some controls are weak or non-existent and there is non-compliance with several controls.
Limited	The system of control is generally weak and there is non-compliance with controls that do exist.

## 6 Management Action

6.1 The recommendations arising above are reproduced in the attached Action Plan (Appendix A) for management attention.

Richard Barr  
Audit and Risk Manager

Action Plan

Internal Audit of Website Management – January 2024

Report Ref.	Risk Area	Recommendation	Rating*	Responsible Officer(s)	Management Response	Target Date
4.2.1	Financial Risk: Potential fines due to breach of legislation.	The Website Accessibility Policy should be reviewed and updated where necessary, as this has not been performed since September 2020.	Medium	Website Service Manager	Website to be audited by an external company in January 2024. The Accessibility Policy will be updated with the findings.	March 2024
		The link to the Government Digital Services training exercise no longer works and therefore should either be removed or updated on the Intranet.	Low	Website Service Manager	Will fix or replace with suitable link.	Completed
		Web authors should be reminded to make sentences twenty-five words or less, where possible.	Low	Website Service Manager	Communications to be sent to all website authors by email and also added to the intranet guidance.	End of January 2024
		Staff should be reminded to check hyperlinks, as several links were found to be broken on the website.	Low	Website Service Manager	Checking and fixing links via the Monsido checker to be carried out more often to fix broken links. Communications sent to web authors with information about how to check for broken links and a reminder to keep their pages up to date.	End of January 2024

<b>Report Ref.</b>	<b>Risk Area</b>	<b>Recommendation</b>	<b>Rating*</b>	<b>Responsible Officer(s)</b>	<b>Management Response</b>	<b>Target Date</b>
		Staff should be reminded to check the readability score of their content and edit content where appropriate.	Low	Website Service Manager	Review of hard to read pages using the Monsido software and sending results to teams for review. Reminder included in an email to website authors.	March 2024
4.3.1	Legal & Regulatory Risks: Failure to comply with key legislation e.g., accessibility legislation or GDPR.	The Accessibility Statement should be updated, as this has not been reviewed since 3 March 2022 and still refers to 2022 deadlines.	Low	Website Service Manager	Website to be audited by an external company in Jan 2024. Accessibility Statement will be updated with the findings.	March 2024
4.4.4	Reputational Risk: Site not maintained to expected quality.	A discussion regarding the contract spending limit should be held with the Procurement team.	Medium	Website Service Manager	To review budgets and spending and discuss with Procurement.	March 2024

\* The ratings refer to how the recommendation affects the overall risk and are defined as follows:

- High: Issue of significant importance requiring urgent attention.
- Medium: Issue of moderate importance requiring prompt attention.
- Low: Issue of minor importance requiring attention.