

Reference: 379033



13 March 2017

Julia Snape  
Information requests

[information.requests@ofcom.org.uk](mailto:information.requests@ofcom.org.uk)

### **Request for information**

Thank you for your email dated 13 February asking about Ofcom's accessibility budget which has been considered under the Freedom of Information Act 2000 ('the FoIA').

You requested the following information: *"what proportion of your budget for producing documentation is spent upon making documents accessible to disabled people? What formats are produced and what proportion of the allocation is spent on each (e.g., Braille, audio, etc.) If this doesn't lead to giving me an answer I would just like to now what Ofcom spends within projects to make its written texts accessible, and what formats - i.e. what is spent on your website, report publications, meeting notes and documentation etc."*

We address first, your questions, "what proportion of your budget for producing documentation is spent upon making documents accessible to disabled people?" and "what formats are produced and what proportion of the allocation is spent on each (e.g., Braille, audio, etc.)

You will recall that in our letter of 2 February, in response to your question "*What is Ofcom's annual budget for accessibility?*", we explained that this information is not held. We do not have a separate annual budget for "accessibility", as issues relating to accessibility form part of our overall equality impact assessments which are integrated into projects and work programmes.

Similarly, we do not have a specific budget for "producing documentation", and therefore do not hold a record of the proportion of that budget which is spent on making documents accessible to disabled people, or on the specific break-down of spend for each format (eg. Braille, etc). We can confirm, however, that Ofcom is committed to ensuring that information is provided in accessible formats in appropriate cases. For example, we have provided Braille versions of our guidance documents for consumers and arranged for British Sign Language ('BSL') interpreters to attend certain stakeholder meetings, including providing BSL recording and subtitling description for our access services consultation document last autumn.

Turning to the third aspect of your request, as to “what Ofcom spends within projects to make its written texts accessible, and what formats - i.e. what is spent on your website, report publications, meeting notes and documentation etc.”, we can confirm that Ofcom holds this information as part of its records for individual projects.

The information Ofcom holds is not, however, readily accessible and would likely take us a considerable amount of time to locate, retrieve, identify and extract a complete set of that material.

In particular, to comply with your request and provide a complete and accurate figure for the spend incurred by Ofcom in making its texts accessible, we estimate that (based on an overview of our files) staff would need to retrieve and manually examine each project file and extract over 300 invoices for the purchase of various outsourced services to identify whether they related to access services, and then to extract the relevant figures to compile a full list. We estimate that it would take at least 18 hours to undertake this task in full.

Under section 12 of the FoIA, a public authority is not obliged to comply with a request for information if the authority estimates that the cost of complying with the request would exceed the “appropriate limit”. In Ofcom’s case, this is £450 or the equivalent of 18 hours of staff time, based on a rate of £25 per person per hour, as set out in the Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004 (‘the Regulations’). As set out above, we estimate that it would take at least 18 hours to identify, retrieve, examine and extract the information you have requested and that, as such, the cost of complying with your request will exceed the appropriate limit. We will therefore not be able to provide a full and complete set of information in response to your request.

That said, we would like to be as helpful to you as possible. We are therefore able to provide you with some information based on our initial searches of some suppliers we have used in the past, which may be of assistance (though please note that the information does not present a complete picture of Ofcom’s spend on making its documents accessible to disabled people). From those searches, we have been able to identify that, in 2015/16, Ofcom has spent at least £2,210 on Braille transcription, British Sign Language interpretation and on audio transcription. We are also currently in the process of undertaking an audit of our website and related development work to improve its accessibility based on the recommendations from the audit.

I hope this information is helpful

Yours sincerely

Julia Snape

If you are unhappy with the response or level of service you have received in relation to your request from Ofcom, you may ask for an internal review. If you ask us for an internal review of our decision, it will be treated as a formal complaint and will be subject to an independent review within Ofcom. We will acknowledge the complaint and inform you of the date by which you might expect to be told the outcome.

The following outcomes are possible:

- the original decision is upheld; or
- the original decision is reversed or modified.

#### **Timing**

If you wish to exercise your right to an internal review **you should contact us within two months of the date of this letter**. There is no statutory deadline for undertaking internal reviews and it will depend upon the complexity of the case. However, we aim to conclude all such reviews within 20 working days, and up to 40 working days in exceptional cases. We will keep you informed of the progress of any such review. If you wish to request an internal review, you should contact:

Steve Gettings  
The Secretary to the Corporation  
Ofcom  
Riverside House  
2a Southwark Bridge Road  
London SE1 9HA

If you are not content with the outcome of the internal review, you have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF