

PDF document conversion: Disproportionate burden assessment

Our site contains many PDF documents created over a number of years. Where they are no longer being updated, we do not intend to recreate them in accessible versions as this would be a disproportionate burden. 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 services.

Scope

This assessment relates to PDF documents. We are fully committed to making all active documentation fully accessible, as accessible PDFs or HTML web pages, and hope to have completed this process by the end of 2026. We are prioritising the documents which get the highest use and working to make all PDFs fully accessible.

Benefits

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

- Historical materials would be fully accessible to all users
- Historical materials would be more easily searchable
- Documents which support or explain our services, including policies and strategies will be accessible for all

Burden

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

- there are hundreds of documents created by the council and published online
- each document would require several hours of work to be recreated in a fully accessible version (estimate based on current experience of converting documents at between 1 and 30 hours per document. This varies depending on length, complexity, and any required sign-off)
- many of the documents contain complex elements which are difficult to retrospectively convert, such as detailed tables, graphs, and diagrams
- some documents haven't been updated for a number of years so are scanned copies. This would result in additional time to create the documents before making accessible adding to the time taken per document.

Other factors

Also relevant to this decision is:

- Interest in many of the documents is low and very few people access them

- Requests for additionally accessible versions of our documents is very rare
- We have and will always assist with accessible versions on request

Assessment

Where documents are no longer in use, or are no longer being updated, there is a high cost in terms of employee hours to convert. These documents are part of the public record, but no longer represent the current position of the council, as a result interest is limited.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. 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.

Published 31 March 2026