Entrust

ISMS Accessible Document Policy

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Owner

Name	Organisation	Role	Signature	Date
Sean Latham	Entrust	Director - Business Compliance	*S Latham*	CWG

Document History

Version	Type of Review	Date	Purpose	Author
0.1	Initial Draft	29 January 2020	Legal requirement	Jacqui Thompson
1.0	Published	03 February 2020		Jacqui Thompson

Reviewers

Name	Organisation	Role
Sean Latham	Entrust	Director - Business Compliance
Ian Wilkie	Entrust	Head of Business Compliance
Jacqui Thompson	Entrust	Information Security Manager
CWG	Entrust	CWG Forum Members

Distribution

Name	Organisation	Role
ALL	Entrust	ALL Entrust Personnel
Public		Via SLA Online and Website

Reference Documentation

Document Name	Reference (if applicable)	Location
Gov.uk	Template Accessible Document Policy	https://www.gov.uk/government/publications/sample-accessible-document-policy/sample-accessible-documents-policy

ISO 27001:2013 Compliancy Requirement

Clause or Control Number	Title	Comment
A.5	Information Security Policies	
A.18.1.1	Identification of applicable legislation and contractual requirements	

Contents

Introduction

A robust, properly certified ISO 27001:2013 Information Security Management System (ISMS) is a key differentiator for an organisation seeking to process data securely and is seen as such across government and the private sector. It is the basis of almost all other modern security management methodologies and is internationally recognised as a standard.

The Entrust organisation adheres to the Capita Group Standard for Accessibility. To support this Standard, the following general information and guidance has been documented for the purposes of the Entrust ISMS:

Accessible Documents Policy

This policy explains how accessible the documents Entrust publishes on its public facing platforms are. It covers PDFs, spreadsheets, reports, PowerPoint presentations and other types of document.

Using our Documents

Entrust Support Services publishes documents in a range of formats.

Entrust would like as many people as possible to be able to use those documents. For example, when we produce a document, we make sure to:

- provide an HTML option where possible
- tag headings and other parts of the document properly, so screen readers can understand the page structure
- make sure we include descriptive text alongside non-decorative images, so people who cannot see them understand what they are there for
- avoid using tables, except when we are presenting data
- write in plain English

How Accessible are our Documents?

New documents we publish and documents you need to download or fill in to access one of the services we provide should be fully accessible.

However, we know that some of our older documents (published before 23 September 2018) are not accessible. For example, some of them:

- are just photocopies and are not marked up in a way that allows screen reader users to understand them
- are not tagged up properly - for example, they do not contain proper headings
- are not written in plain English

Documents published before 23 September 2018 are exempt from the regulations, so we do not currently have any plans to make them accessible.

However, if you need to access information in one of these older documents, you can contact us and ask for an alternative format.

What to do if you Cannot Use One of our Documents

If you need a document we've published in a different format, you can:

- email – enquiries@entrust-ed.co.uk
- call – 0333 300 1900

We will consider the request and get back to you within 7 days.

Reporting Accessibility Problems with One of our Documents

We are always looking to improve the accessibility of our documents. If you find any problems not listed on this page or you think we're not meeting accessibility requirements, contact: securityincidents@entrust-ed.co.uk with details of the document and your contact details and we will endeavour to investigate.

Enforcement Procedure

The Equality and Human Rights Commission (EHRC) is responsible for enforcing the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018 (the 'accessibility regulations'). If you are not happy with how we respond to your complaint, contact the Equality Advisory and Support Service (EASS).

Technical Information about the Accessibility of our Documents

Entrust Support Services is committed to making our documents accessible, in accordance with the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018.

The documents that Entrust Support Services publishes are fully compliant with the Web Content Accessibility Guidelines (WCAG) version 2.1 AA standard.

Disproportionate Burden

Documents published before 23 September 2018 are exempt from the regulations, so we do not currently have any plans to make them accessible.

Content that's not Within the Scope of the Accessibility Regulations

Documents published before 23 September 2018 are exempt from the regulations, so we do not currently have any plans to make them accessible.

Many of our older PDFs and Word documents do not meet accessibility standards - for example, they may not be structured so they're accessible to a screen reader. This does not meet WCAG 2.1 success criterion 4.1.2 (name, role value).

Some of our PDFs and Word documents are essential to providing our services. For example, we have PDFs with information on how users can access our services, and forms published as Word documents. By September 2020, we plan to either fix these or replace them with accessible HTML pages.

The accessibility regulations do not require us to fix PDFs or other documents published before 23 September 2018 if they're not essential to providing our services.

Any new PDFs or Word documents we publish will meet accessibility standards.

Non-Compliance with Policies

Non-compliance with this policy could result in disciplinary action being taken.

However, in some cases, it can be inappropriate or unsuitable for employees to adhere to the requirements set out in this policy. This non-compliance could be in relation to the use of access to work equipment, or in relation to system design.

All non-compliance with Polices needs to be reported to the Information Security Manager and any risks mitigated as required.

Responsibilities and Acceptance

All Entrust personnel (i.e. permanent staff, associates, consultants and temporary staff) are required to adhere to this policy and any supporting Capita and Entrust policies and procedures.

All Entrust personnel are required to acknowledge their understanding and acceptance of the requirements mandated in this policy upon commencing employment with the Entrust organisation.

Any amendments or revisions to this policy must be reviewed and approved by the Entrust Compliance Working Group (CWG) and will be communicated to all personnel accordingly.

Review and Amendment

This policy will be reviewed on an annual basis. Any amendments or revisions to this Policy will be reviewed and approved by the Entrust CWG and will be communicated to all personnel accordingly.

END OF DOCUMENT