

PDF Accessibility Improvement Plan

Exmoor National Park Authority

Objective: Improve the accessibility of PDF documents across the Exmoor National Park website, reduce legal and reputational risk, and ensure visitors can access information regardless of ability.

The key rule: publish information as a web page wherever possible. If a PDF is genuinely needed, it must be made accessible and checked before it is published.

Background

PDFs have been widely used for many years. They are useful in some situations, but can create barriers for people using screen readers, keyboard navigation, magnification or other assistive technology.

Aspect	Advantages of PDF	Accessibility risks
Scanned documents	Historical or signed paper documents can be published as PDFs.	A scan may be only an image of text. Adobe Acrobat Pro can use OCR to create selectable text, but the tags, headings, reading order, tables, links and image descriptions must then be checked and corrected.
Screen readers	Properly created tagged PDFs can work with screen readers and other assistive technology.	Untagged or poorly tagged PDFs can be extremely difficult or impossible to navigate.
Document structure	PDFs can contain headings, lists, tables, alternative text and a defined reading order.	The structure must be created and maintained correctly. A document that looks well structured may have little meaningful structure for assistive technology.
Forms	PDFs can provide downloadable or interactive forms.	PDF forms can have keyboard, labelling, focus-order and screen-reader problems if they are not specifically designed and tested for accessibility.
Tables	PDFs can display structured information while retaining a consistent layout.	Complex tables can be difficult for screen readers to interpret. Rows, columns and headers must be tagged correctly.
Images and charts	PDFs can present reports, maps, diagrams and designed publications.	Images, charts and diagrams need suitable alternative text or accessible descriptions. Complex visual information can be particularly difficult to make accessible.

Summary: PDFs are useful for preserving layout, sharing formal documents and providing downloadable versions, but they can create significant accessibility barriers if they are scanned, untagged, poorly structured or designed mainly for print. Wherever information is intended to be read online, accessible HTML should normally be preferred. PDFs should be used only where they add clear value and are properly checked for accessibility.

1. Current situation

The website contains a significant number of PDF documents, many of which may:

- Not be fully accessible to screen-reader users
- Lack proper heading structures
- Contain untagged images and tables
- Be scanned documents rather than selectable text
- Fail WCAG 2.2 or PDF/UA accessibility standards

Many of these documents remain valuable and provide important information to visitors, residents, businesses, researchers and schools.

The aim is progressive improvement, not wholesale removal.

2. Strategic principles

We will publish web pages first where possible, make new PDFs accessible from the start, and prioritise existing documents where improvement will have the greatest public benefit.

Principle 1: HTML first

Where practical, publish content directly as a web page rather than a PDF. Web pages are:

- More accessible
- Easier to find through search engines
- Easier to maintain
- Better on mobile devices

Principle 2: Accessible PDF by default

All new PDFs should:

- Be created from an accessible source document
- Use proper heading styles
- Include alternative text for useful images
- Use accessible tables
- Have the correct reading order
- Pass the Adobe Acrobat Accessibility Checker

No new inaccessible PDF should be published.

Principle 3: Prioritised remediation

Not every existing PDF requires immediate remediation. Focus effort where it delivers the greatest public benefit, particularly documents needed to access services or complete current processes.

3. What staff need to do

Before creating a PDF

1. Can the information be published as a normal web page? If yes, use a web page.
2. Is it a form? Use an accessible online form where possible.
3. Is a downloadable, printable or fixed-layout version genuinely needed? If not, do not create a PDF.

Create an accessible Word document

- Use Word heading styles such as Heading 1 and Heading 2.
- Write in plain English, using short sentences and clear headings.
- Use meaningful link text, not “click here” or a long web address.
- Add alternative text to useful images, charts and diagrams. Mark purely decorative images as decorative.
- Use proper bulleted and numbered lists.
- Use simple tables with a clear header row. Avoid merged cells, split cells and blank rows or columns.
- Give the document a clear title and set the correct language.
- Select Review > Check Accessibility and fix the issues found.

Export and check the PDF

- Use Save As or Export. Do not use Print to PDF, because this can remove accessibility information.
- If shown, select the option to include document structure tags for accessibility.
- In Adobe Acrobat Pro, run the Accessibility Checker and fix the issues found.
- Check the title, language, tags and reading order.
- Check that text can be selected and searched.
- Check links and interactive form fields using only the keyboard.

Scanned documents

A scanned PDF can be made accessible using Adobe Acrobat Pro, but OCR alone is not enough. Run OCR, then check and correct the recognised text, tags, headings, reading order, tables, links and image descriptions. If the original Word document is available, correcting and exporting that is usually easier and more reliable.

4. Publishing checklist

Complete every relevant check before sending a document to the website team.

Word document	Finished PDF
☐ Heading styles used	☐ Tagged PDF
☐ Images have suitable alternative text	☐ Adobe Accessibility Checker passed
☐ Tables are correctly structured	☐ Document title entered
☐ Links have meaningful names	☐ Correct language specified
☐ Reading order is logical	☐ Reading order verified
☐ Accessibility Checker issues fixed	☐ Keyboard navigation tested
	☐ Text can be selected and searched

If a required check fails, do not publish the PDF. Correct the source document, export it again and repeat the checks. Ask the Website or ICT team if you cannot correct it.

5. Staff training

Training should be available for website editors, communications staff, project teams and administrative staff. It should cover:

- Creating accessible Word documents
- Creating and remediating accessible PDFs
- Basic WCAG requirements

- Writing useful alternative text

6. Success measures

Target date	Measure
By month 6	• Complete a full PDF inventory • Make new PDFs accessible by default • Review the 50 most-downloaded PDFs
By month 12	• Make high-priority documents compliant • Update the accessibility statement • Put a PDF governance process in place
By month 18	• Achieve a significant reduction in inaccessible PDFs • Make the majority of visitor-facing information available as web content • Embed accessibility into normal publishing workflows

7. Recommended immediate next steps

4. Create a master inventory of PDFs on the website.
5. Identify the 50 most-viewed PDFs.
6. Classify each document as: convert to HTML, remediate, archive or replace.
7. Update publishing guidance so all new PDFs are accessible.
8. Begin remediation with planning, visitor information and educational resources.

This approach is realistic for a National Park Authority with a large legacy document estate. It demonstrates compliance intent and measurable progress without overwhelming staff resources.

8. Exemptions and special cases

Some content is exempt from the accessibility regulations, but exemptions must be considered carefully. The table below explains the main situations.

Type of PDF or document	Accessibility position	What this means in practice
PDF published before 23 September 2018	Generally exempt	It does not normally have to be made accessible retrospectively, provided it is not needed for an active administrative process or to access a service.
Pre-23 September 2018 PDF needed for a current service	Not covered by the older-document exemption	If people need the document to access or use a current service, accessibility requirements may still apply.
PDF published on or after 23 September 2018	Not exempt because of age	It should meet the applicable accessibility requirements.
New PDF containing old or historic material	Not automatically exempt	Uploading old material as a new PDF does not necessarily make it exempt simply because the original information is old.
Archived or historical documents	May be exempt	Genuinely archived content that is no longer needed for active administrative processes may fall outside the requirements.

Type of PDF or document	Accessibility position	What this means in practice
Heritage collection material	Specific exemptions may apply	Some reproductions of heritage items may be exempt where accessibility cannot reasonably be achieved without significantly altering the item, or where an accessible solution is unavailable.
PDF containing maps or mapping	Maps have a specific exemption	Online maps and mapping services have an exemption, although essential information provided for navigational use must be supplied in an accessible digital form.
PDF that is difficult or expensive to remediate	Not automatically exempt	Difficulty, cost or document size does not by itself create an exemption.
PDF where accessibility would be a disproportionate burden	Possible exception, but must be justified	The Authority must carry out and record an assessment considering resources, costs and benefits to disabled users.
New reports, strategies, policies and consultation documents	Accessibility requirements normally apply	Publish the information as HTML wherever possible rather than relying on a PDF.
Accessible PDF provided alongside HTML	Generally appropriate where the PDF serves a genuine purpose	HTML can be the primary accessible version while the PDF provides a downloadable, printable or fixed-layout version.

9. Terms used in this guidance

Alternative text: A short description explaining the purpose or meaning of an image.

Assistive technology: Software or equipment that helps someone use digital content, such as a screen reader or voice control.

OCR: Technology that turns text in a scanned image into selectable and searchable text.

Reading order: The order in which a screen reader or keyboard user moves through the document.

Tagged PDF: A PDF that identifies its headings, paragraphs, lists, tables and images for assistive technology.

HTML: The normal format used for web pages. It is generally easier to make accessible, use on mobile devices and keep up to date than a PDF.

Further guidance

- [GOV.UK: Publishing accessible documents](#)
- [GOV.UK: Accessibility requirements for public sector websites and apps](#)
- [Adobe: Create and verify PDF accessibility](#)

Document owner: Website and Communications teams | Review when government guidance or internal publishing processes change