Accessibility Evaluation Report

Ethical Standards Commissioner
November 2023

Contents

1. Executive Summary

This report describes the conformance of the Ethical Standards Commissioner website with W3C's Web Content Accessibility Guidelines (WCAG). The review process is detailed in Section 5 below and is based on the evaluation described in Accessibility Evaluation Resources.

Based on this evaluation, the website could meet the WCAG 2.2 conformance level AA by addressing the issues highlighted within this report. Detailed review results are available in Section 6 below. Resources for the follow-up study are listed in Section 7 below. Feedback on this evaluation is welcome.

Overall, the accessibility standards experienced during the audit were good. There are exceptions and areas where attention is required, but considering the range of functionality, volume of content, and the number of interactive elements involved, most content is accessible across a range of disabilities.

Failures identified mainly come under the "Perceivable" and "Operable" WCAG principles. These include visual contrast and text size making some content harder to read. There are accessibility tools available for addressing this, which when enabled then worked very well, but locating the tool was an issue.

Key recommendations are to upscale icons for changing the colour theme and text size, so that it is easier for users to spot, and to implement a process to maintain content accessibility.

2. Methodology

The methodology for this audit was based on discussions with the Ethical Standards Commissioner team. These were the steps that were followed:

1. Measure the number of website pages and analyse the audit sample, including Google Analytics data.
2. Assign testers according to the website project length for automated tests.
3. Run Automated Accessibility Tests to gather raw accessibility data.
4. Interpret and consolidate automated data into individual reports.
5. Identify pages by priority fixes.
6. Determine User Journey (using pages with highest priority fixes and most visited pages).
7. Assign testers with disabilities for manual tests following the User Journey.
8. Assign simulation testers following the User Journey.
9. Generate User Journey Report (identifying the persona).
10. Consolidate Automated and Manual report.
11. Produce the Final Report, and also suggest Accessibility Statement inclusions based on the results.

3. Scope of Review

The following website is included in this review:

https://www.ethicalstandards.org.uk/

Automated tests: 514 pages and files scanned
Manual tests: 10 steps in the user journey

The evaluation results in this report are based on tests conducted between September - November 2023. The website may have changed since that time.

4. Reviewers

Manual Tests:
Tester A (Navigability and simulated evaluation)
Tester B (JAWS evaluation)
Tester C (Combined reduced visual and hearing evaluation)
Tester D (Autism, Dyslexia ADHD and dyscalculia evaluation)

The organisation with which reviewers are affiliated: **Passion4Social CIC**

Contact information: **Thiago Carmo**, thiago@passion4social.com

Natural language(s) with which reviewer(s) is/are fluent: **English (All), Spanish (D)**

5. Review Process

WCAG Tested Level: **WCAG 2.2 Level A, AA**

Automated Testing Tools:

- **Tenon**
- **SortSite**
- **aXe**
- **Chrome Accessibility Developer Tools**
- **DynoMapper**
- **WAVE**

Which reviews all WCAG 2.2 Success Criteria.

Manual Testing Tools:

- **JAWS**
- **Keyboard**
- **Web Disability Simulator**
- **Disability Simulator (SilkTide)**
- **Funkify**

Which review navigability and different disability experiences, covering:

- Keyboard testing: navigation and focusable items, quality and accuracy of link text and image attributes
- Check for links with ambiguous link text, spelling mistakes and reading order
- Zoom readability/usability
- Accessibility of dynamic changes: predictive search, page content that changes on activation, filtered listings
- Page structure: landmarks and headings

During manual testing, reviewers gave feedback on their experience of understanding the content, as well as simply accessing it.

6. Results and Recommended Actions

Overall summary of findings

WCAG principles

The WCAG 2.2 standard is based on the four core principles that a website should be perceivable, operable, understandable and robust. The following is a summary of issues found during the tests completed.

Perceivable

In the manual testing, there were 3 specific WCAG 2.2 non-compliance types which come under the Perceivable principle. The WCAG principles' success criteria in which there were failures included:

- **Success Criteria 1.1:** There is non-text content that the user cannot access because there is no alternative format for them. (This could be controlled, CAPTCHA, decoration elements, images etc)
- **Success Criteria 1.3:** There is content the user cannot access because it does not work the way they use the browser (navigating using a keyboard, screen reader, or simply zooming in to make the text bigger).
- **Success Criteria 1.4:** There is content the user cannot access because it is hard to see (colours that they can't tell apart, not enough contrast, prevented from zooming in on text)

Content on the website was perceivable most of the time. In some cases, the contrast was not accommodating and posed issues to users accessing the website on their phone(testers on PC did not have the same issue). This was mainly due to accessibility options not being easily spotted, as noted by one of the testers. There was also an issue with the keyboard not producing clear enough focus highlights on elements when using the form.

In the automated testing, there were 7 specific WCAG 2.2 non-compliance types which come under the Perceivable principle and a total of 313 occurrences. Of these 4 were at A level (121 occurrences) and 3 at the AA level (192 occurrences).

Most of these identified non-compliances also affected the perceivability of content during the manual testing. Particularly, colour contrast and heading issues with PDFs causing one tester to get dizzy while reading, as well as colour contrast issues with site default pages for those who could not find or access accessibility options.

Operable

In the manual testing, there was 1 specific WCAG 2.2 non-compliance type which comes under the Operable principle. The WCAG principles' success criteria in which there were failures included:

- **Success Criteria 2.4:** The way navigation works does not allow the user to easily access all the content (missing page title or title not unique, links not labelled clearly, navigation buttons hard to find, need to scroll through lots of content to find the next navigation control).

There were no significant failures in this area for screen readers and keyboard-only users in terms of navigating. Any failures were mostly due to checkboxes and form highlights. Using only the keyboard, sometimes does not highlight elements enough to be noticeable and so it is hard to tell if your actions have an impact.

In the automated testing, there were 3 specific WCAG 2.2 non-compliance types which come under the Operable principle and a total of 64 occurrences. All of these were A-level

Some of these identified non-compliances were highlighted again during the manual testing. For instance, the focus outline on text entry fields and tick boxes not being visible enough when using the keyboard, or not providing multiple ways to reach each page or important content.

Understandable

In the manual testing, there were 0 specific WCAG 2.2 non-compliance types which come under the Understandable principle.

The content on the website was understandable most of the time. The only real issue was the form, as more clarity could be given to make it clear exactly what you need to consider before making a complaint. This was not clear to all, especially for those with reading difficulties.

In the automated testing, there was 1 specific WCAG 2.2 non-compliance type which comes under the Understandable principle and a total of 7 occurrences. All of these were A-level

The failures identified were due to PDF files missing the lang attribute to identify the language of the page.

Robust

This area overlaps with the other principles, mainly highlighting the need for compatibility with assistive technologies.

In the manual testing, there were 0 specific WCAG 2.2 non-compliance types which come under the Robust principle.

In the automated testing, there were 1 specific WCAG 2.2 non-compliance type which comes under the Robust principle and a total of 22 occurrences. All of these were A-level.

The main themes across all the principles are duplicated IDs, the lack of titles, incorrect use of attribute markup, or links missing text or labels. While our manual testers did not notice all of these issues, our consultants identified some of them during the simulation tests.

Communicating accessibility

Sitemaps and Accessibility Pages or Statements are key for users with a range of disabilities. Making these easy to find and access, and of consistent quality, will greatly improve the experience of users with disabilities.

Summary of the website

This summary brings together the results of manual and automated testing and highlights the key points for the website.

To create an Accessibility Statement, the issues which will directly affect a user have been specified, but other actions are also recommended to improve the experience of users with disabilities. Where issues were identified that prevented users from accessing content at all, these have been noted as needing to be addressed as a priority.

https://www.ethicalstandards.org.uk/

- Positive highlights
  - The website supports keyboard shortcuts.
  - No issues were experienced when navigating the pages with only a keyboard.
  - Except for the "remote-working-policy" page, there were no issues with navigation. Users found navigation easy and intuitive.
  - The website works well with a screen reader 95% of the time.
  - Colour theme/contrast options are really powerful, and when used, alleviated a lot of issues if the options were noticed.
  - Information, aside from some aspects inside the complaint form, was accessible and easy to process and understand.

- Recommended actions
  - Ensure all important pages can be accessed in several ways.
  - Ensure all alt-text for icons that require mouse hovering to unveil information, have either that information in the alt text or a way to unveil that information without the need for a mouse.
  - Improve outline and contrast for the accessibility tools' buttons.

- What should be done right now?
  - Increase the size of colour contrast/theming options, as well as text enlargement options, so that they are easier for users to spot.
  - Better contrasting options for PDFs, and use less intense colours, as not doing so can cause users to have physical reactions.
  - More differentiation needed between the "meet the team" page and the "public appointment advisors" page, as some users mistake one for the other.

- Failures to highlight in Accessibility Statement (if not resolved) according to **WCAG 2.2 Reference**:
  - Failure of Success Criterion 1.1.1 due to omitting the alt attribute or text alternative on img elements, area elements, and input elements of type "image"
    - https://www.w3.org/TR/WCAG20-TECHS/F65.html
  - Failure of Success Criterion 1.3.1 due to using structural markup in a way that does not represent relationships in the content
    - https://www.w3.org/TR/2016/NOTE-WCAG20-TECHS-20161007/F43
  - Failure of Success Criterion 1.3.2 meaningful sequences
    - https://www.w3.org/TR/UNDERSTANDING-WCAG20/content-structure-separation-sequence.html
  - Failure of Success Criterion 1.4.1 due to creating links that are not visually evident without colour vision
    - https://www.w3.org/TR/WCAG20-TECHS/F73.html
  - Failures for Success Criterion 1.4.3 - Contrast (Minimum)
    - https://www.w3.org/TR/UNDERSTANDING-WCAG20/visual-audio-contrast-contrast.html
  - Failures for Success Criterion 1.4.11 - Non-text contrast
    - https://www.w3.org/WAI/WCAG21/Understanding/non-text-contrast.html
  - Failure of Success Criterion 2.4.2 due to the title of a Web page not identifying the contents
    - https://www.w3.org/TR/WCAG20-TECHS/F25.html
  - Failure of Success Criteria 2.4.4, 2.4.9 and 4.1.2 due to not providing an accessible name for an image which is the only content in a link
    - https://www.w3.org/TR/WCAG-TECHS/F89.html
  - Failure of Success Criterion 2.4.7 due to styling element outlines and borders in a way that removes or renders non-visible the visual focus indicator
    - https://www.w3.org/TR/WCAG20-TECHS/F78.html
  - Failure of Success Criterion 3.1.1 Language of Page
    - https://www.w3.org/TR/UNDERSTANDING-WCAG20/meaning-doc-lang-id.html

Accessibility statements

All websites require an Accessibility Statement to highlight the areas where there are known accessibility issues, and what is being done about them.

The recommended structure for an Accessibility Statement can be generated automatically using this tool:

https://www.w3.org/WAI/planning/statements/generator/#create

A full example of an Accessibility Statement can also be found here:
https://www.gov.uk/government/publications/sample-accessibility-statement

Using the summary of the website section above as a starting point, key failings can be added to the Accessibility Statement where they have not yet been resolved.

The Accessibility Statement should be implemented on a page which is easy to reach. On many websites, the accessibility statement is only linked in the footer of the page where tabbing through links can take a very long time to reach. We recommend that the accessibility statement link be positioned near the top of the page and clearly labelled.

As well as this key page, notifying users when content is not accessible, and signposting alternatives, will make a significant difference. This could be a notice before the affected content advising what is and is not accessible on the page, and providing links to more details or accessible versions. This approach is appreciated especially by users of assistive technology.

PDFs

PDFs are less accessible than HTML pages by nature, as the content is in a fixed format. For example, text does not reflow when zoomed in.

However, most methods of generating a PDF (e.g. exporting from a Microsoft Word document) include accessibility features by default. For example, making text accessible to screen readers. Additional features increase the accessibility of a document, for example adding bookmarks to make navigation easier, and adding descriptions for images and diagrams.

PDFs tested in the audit sample had some accessibility issues. Mainly contrast and intensity produced a physical reaction in some people and/or made it hard to read the contents.

Ideally, information would be presented within the website rather than on PDFs, to increase accessibility and ease of use.

However, where PDF documents continue to be used, the following points should be noted and actioned, or included in accessibility statements:

- PDFs should include bookmarks - these greatly aid accessibility and should be added whenever a PDF is generated. For details please see https://www.w3.org/TR/WCAG20-TECHS/pdf#PDF2
- PDF generation should include all accessibility features available in the generating application. For guidance see https://webaim.org/techniques/acrobat/converting
- A description of the PDF file should be inserted beside the link, which could be just a few words, or ideally a bulleted list of the main contents of the file.

Real-world accessibility

The ultimate aim of compliance with WCAG 2.2 is not a box-ticking exercise, but instead to make the lives of real people easier when they use websites which contain information important to them.

It is not usually practicable to meet every aspect of the standards fully, and automated tests in particular will uncover technical non-compliances which do not affect the real-world experience of users with disabilities.

This is the reason for the approach taken in this accessibility review - using manual testers with disabilities as well as automated scans.

The **Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018** legislation reflects the real-world limits on what is practicable with the inclusion of the Disproportionate Burden clause:
http://www.legislation.gov.uk/uksi/2018/852/regulation/6/made

The summary provided above for the website aims to highlight the non-compliances which should be corrected because they are likely to have a real-world impact on users. Other technical non-compliances in the automated test reports are likely to have little to no impact on real users. This was verified by the fact that manual testers did not encounter issues in these areas.

Another factor is that users with certain disabilities may not require access to all the content included in this audit. It is impossible to tell from an external perspective whether this is the case or not, but it is not a good use of resources to correct technical non-compliances which will never impact a real user.

The real-world approach we recommend is as follows:

1. Proactively correct the major issues highlighted as a priority.
2. Implement accessibility statements making clear that some aspects of the sites are less accessible. Actively encourage user feedback in these statements and elsewhere on the site to gather data on what content is least accessible and most in demand.
3. Have a reactive approach to the incoming feedback, implementing fixes and changes where there is demand.
4. Implement processes to ensure new content and new websites are compliant from the beginning.

Monitoring and maintaining compliance

To maintain compliance with the WCAG standards, a process will be required for approving all content before it is published. Trained individuals can use a checklist to ensure all key requirements are met, and content can be modified before it is published.

An example checklist, based on the most common issues found would be:

- Ensure new images always have descriptive alt text.
- Ensure new page titles are always unique and descriptive.
- Ensure headings in HTML are never empty (not used for spacing).
- Ensure links and linked images have correct alt text so screen readers can use them to navigate.
- Ensure tables are correctly marked up if used in HTML content.
- Ensure bold text is marked using "strong" in the HTML so the emphasis can be understood by screen readers.
- For all rich media or interactive content, plan an accessible alternative at the same time, or as a minimum, a notice on the page describing the content and signposting alternatives.
- Update the Accessibility Statement page if new content is added that does not have alternative formats.

A process of this kind needs to be ever-evolving, with a checklist and methodology at its core which is continually improved. Practically, it will require:

- A process management system where the process can be easily followed for each piece of new content, and the checklist easily be amended or added to when new issues arise which need to be checked on future content.
- A core checklist like the one above.
- Trained individuals with the skills to edit HTML content, who take each piece of new content on a web platform and work through the checklist before it is published.
- Optionally, and depending on the publishing platform, the software can be used to automatically check for some accessibility requirements and flag issues during the content editing process. However, this cannot fully replace a human editor, in particular for ensuring descriptions are appropriate.

This process would only be effective if it is consistently adopted, otherwise, content which is added without accessibility checks would need to be checked and edited after publishing which means inefficient double-handling and leaves windows where content is published but may not be fully accessible.

This may require a restructuring of existing content publishing processes to incorporate an accessibility editing stage, however, it is essential if ongoing compatibility with WCAG standards is to be maintained.

7. References

Web Content Accessibility Guidelines (WCAG) Overview
https://www.w3.org/WAI/intro/wcag

Web Content Accessibility Guidelines 2.1
https://www.w3.org/TR/WCAG21/

Web Content Accessibility Guidelines 2.2
https://www.w3.org/TR/WCAG22/

Techniques for WCAG 2.1
https://www.w3.org/WAI/WCAG21/Techniques/

Accessibility Evaluation Resources
http://www.w3.org/WAI/eval/

Web Accessibility Evaluation Tools List
https://www.w3.org/WAI/ER/tools/

Using Combined Expertise to Evaluate Web Accessibility
https://www.w3.org/WAI/eval/reviewteams