Digital Accessibility Centre

Accessibility 2nd Retest Report for TPX Impact Digital Planning Register

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Version	v1.0 Retest 2
Standard	WCAG 2.2

Document Control

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Contents

Executive Summary

A 2nd accessibility retest for TPX Impact Digital Planning Register was carried out by the Digital Accessibility Centre (DAC) user/technical team on 25th February 2025.
The TPX Impact Digital Planning Register service was assessed against the [Web Content Accessibility Guidelines WCAG 2.2](#).

This document incorporates the findings regarding any accessibility barriers identified during the testing process. The issues reported are examples of any assistive technology barriers which were encountered during accessibility testing, and information has been provided detailing how to resolve them. **Please note:** additional instances of these barriers may exist in other pages of the service; wherever these barriers are present, they will also need to be resolved.

The remaining issues in the report have been updated where relevant, reflecting the current status of unresolved problems. A summary of these can be found in [Appendix III.](#)

All issues at level A and AAA have been resolved. No issues at Level AA were identified.

Please note: As with the first retest in January, as of the second retest in February, we were still not able to access Journey 2 in order to retest [DAC_Link_Appearance_Usability_01](#). As such this one instance was not able to be checked.

Issues are organised in the report by the WCAG 2.2 conformance levels. To achieve WCAG 2.2 Level AA compliance all Level A and Level AA accessibility issues must be resolved. We strongly recommend resolving reported accessibility issues regarding WCAG 2.2 Level AAA; however, this is not a requirement for achieving WCAG 2.2 Level AA compliance.

Audit Summary

The report details the issues that have been identified with the service. To meet government accessibility requirements, and comply with the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018 it is important to ensure that the service meets level AA of the Web Content Accessibility Guidelines 2.2 (WCAG 2.2) as a minimum and all WCAG 2.2 level A and AA issues listed are resolved.

Areas of the website which fail to meet the WCAG 2.2 AAA requirements are not in scope for the purposes of this audit, however, where issues were encountered by our analysts, these have been reported.

We highly recommend that all issues from the Usability feedback section of the report are also addressed to ensure a fully accessible, usable, and inclusive service.

A

N/A

AA

N/A

Scope

Tasks

Brief Task and/or URLs are listed below along with the specific browser and AT set.
URL: https://dpr-staging-f3c30ff39338.herokuapp.com/

See Appendix I for a full list of tasks and instructions.

Browser matrix and Assistive Technology (AT) combinations
Desktop

User type	Operating System (OS)	Browser	Assistive Technology
Blind	Windows	Chrome (Latest version)	JAWS 2019 or above
		Chrome (Latest version)	NVDA (Latest version)
Mobility	Windows	Chrome (Latest version)	Dragon Voice Activation v15 or above
		Chrome (Latest version)	Keyboard
Deaf	Windows	Chrome (Latest version)	-
Colour Blind/ Dyslexia	Windows	Chrome (Latest version)	-
Low Vision	Windows	Chrome (Latest version)	Screen Magnification Reflow, Text Spacing
		Chrome (Latest version)	Windows Magnifier
		Edge (Latest version)	ZoomText
Cognitive Impaired/ Aspergers/ Anxiety	Windows	Edge (Latest version)	System inverted colours

Mobile/Tablet

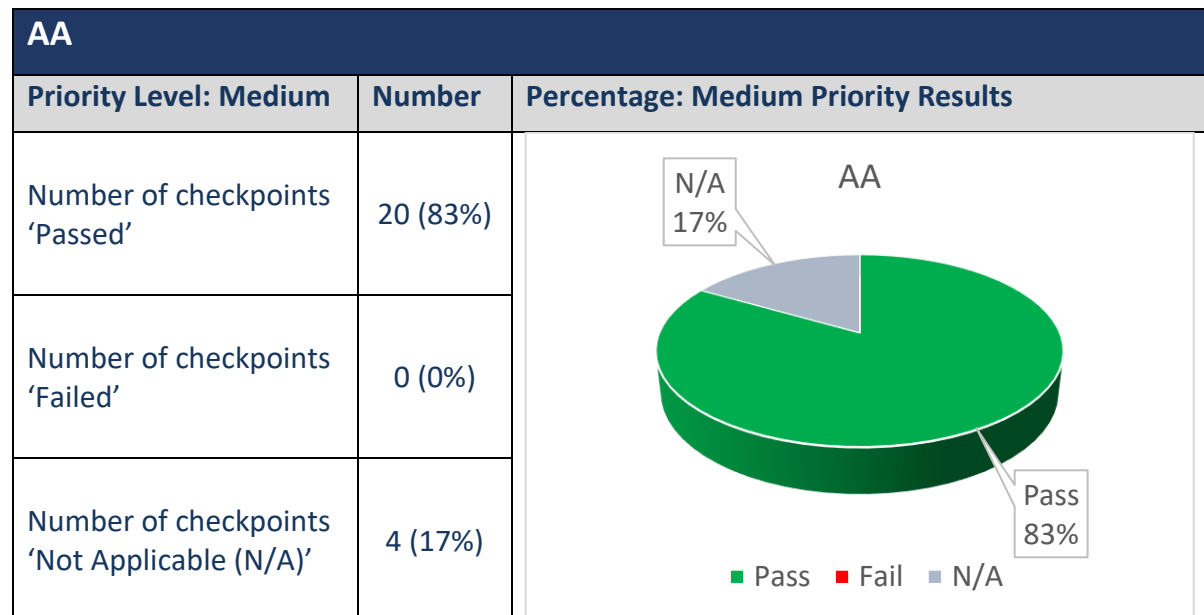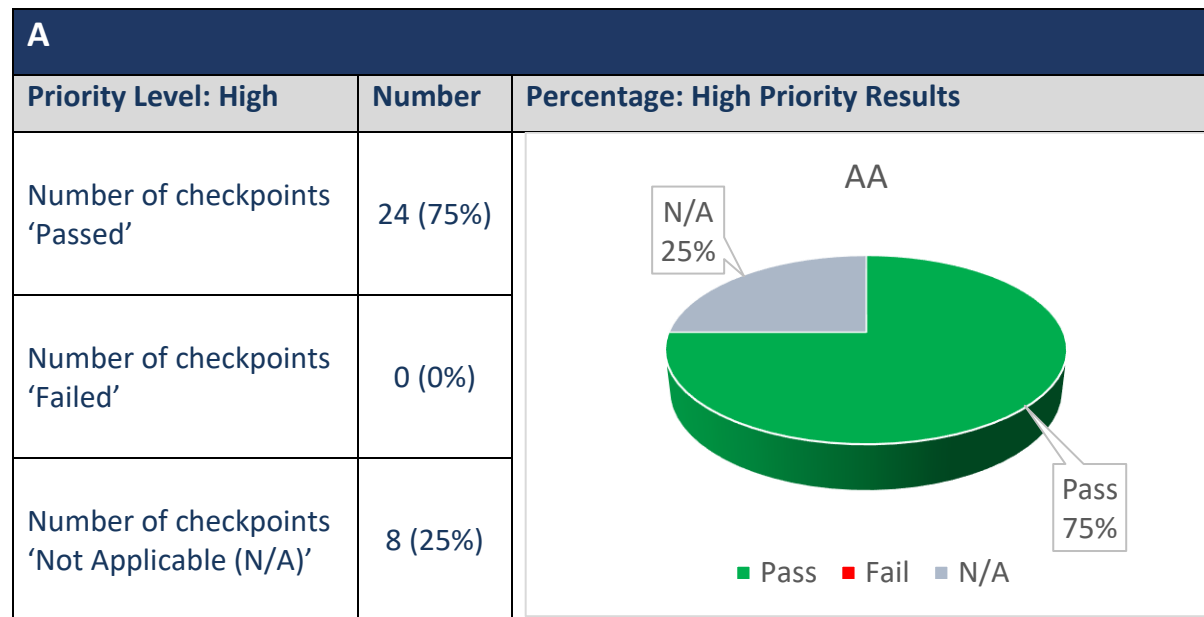| User type	Operating System (OS)	Browser	Assistive Technology
Blind	iOS	Safari (V12 or later)	VoiceOver
	Android	Chrome (Latest version)	TalkBack/ Voice Assistant
Mobility	iOS	Safari (V12 or later)	-
	Android	Chrome (Latest version)	-
Deaf	iOS	Safari (V12 or later)	-
Colour Blind/ Dyslexia	iOS/Android	Safari (V12 or later) / Chrome (Latest version)	-
Low Vision	Android	Chrome (Latest version)	Magnification
	iOS	Safari (V12 or later)	Pinch to Zoom
	iOS/Android	Safari (V12 or later)/ Chrome (Latest version)	System inverted colours

WCAG 2.2 Breakdown

The graphs below detail the number of checkpoints that passed, failed or were not applicable to the service.
Please refer to the Classification of Accessibility Issues for more information.

A		
Priority Level: High	**Number**	**Percentage: High Priority Results**
Number of checkpoints 'Passed'	24 (75%)	AA N/A 25% Pass 75% ■ Pass ■ Fail ■ N/A
Number of checkpoints 'Failed'	0 (0%)	
Number of checkpoints 'Not Applicable (N/A)'	8 (25%)	

AA		
Priority Level: Medium	**Number**	**Percentage: Medium Priority Results**
Number of checkpoints 'Passed'	20 (83%)	AA N/A 17% Pass 83% ■ Pass ■ Fail ■ N/A
Number of checkpoints 'Failed'	0 (0%)	
Number of checkpoints 'Not Applicable (N/A)'	4 (17%)	

Audit Results

These are the results of the Digital Accessibility Centre accessibility audit organised by A, AA, AAA priorities.

Each area contains a reference to the WCAG 2.2 success criteria, a brief overview of the issue encountered, a description of issues found along with user testing commentaries and solutions.

High Priority WCAG Level A

The following section contains areas that failed to meet WCAG 2.2 A. For the service to fall in line with WCAG 2.2 requirements, all A issues must be resolved.

N/A

Medium Priority WCAG Level AA

The following section contains areas that failed to meet WCAG 2.2 AA. For the service to fall in line with WCAG 2.2 requirements, all A and AA issues must be resolved.

N/A

Low Priority WCAG Level AAA

Areas of the service which fail to meet the WCAG 2.2 AAA requirements are not in scope for the purposes of this audit, however, where issues were encountered by our analysts, these have been reported. We highly recommend that these issues are resolved.

N/A

Usability feedback

The following section contains feedback from our analysts that although do not fail to meet WCAG 2.2 may prove challenging for users of the service.

Error Summary

Error summary components do not conform with GOV.UK Design System recommendations.

Reference:
Usability & GOV.UK Design System requirement

Issue ID: DAC_Error_Summary_Usability_01

URL: https://dpr-staging-f3c30ff39338.herokuapp.com/camden/25-00153-HAPP/submit-comment?page=2
Page title: Application 24-00143-HAPP | Camden Digital Planning Register
Journey: Journey 1
5. Tell us what you think
d. Tick any option from the 'What topics do you want to comment on?' checkbox

Screenshot:

An error summary is not displayed when validation errors occur which does not conform with GOV.UK Design System recommendations.

Current code ref(s):
#topics-error
```
<p id="topics-error" class="govuk-error-message" role="alert" aria-
live="assertive"><span class="govuk-visually-hidden">Error:</span> Please select
at least one topic</p>
```

Examples of additional instances:

- URL: https://dpr-staging-f3c30ff39338.herokuapp.com/camden/24-00143-HAPP/submit-comment?page=3&topicIndex=0
  Page title: Application 24-00143-HAPP | Camden Digital Planning Register
  Journey: Journey 1
  5. Tell us what you think
  f. Type dummy data into the 'Comment on the design, size or height of new buildings or extensions' text area

- URL: https://dpr-staging-f3c30ff39338.herokuapp.com/camden/24-00143-HAPP/submit-comment?page=4&topicIndex=0
  Page title: Application 24-00143-HAPP | Camden Digital Planning Register
  Journey: Journey: Journey 1
  5. Tell us what you think
  h. Type dummy data into the 'Your details' edit fields

Additional instances of this issue may exist on other pages throughout the website; wherever this issue occurs, they too will need to be resolved.

Solution:
Consider implementing error summary components even when there is only one validation error. Please refer to Error summary – GOV.UK Design System.

Link Appearance

Link text is not distinguishable by its visual appearance.

Reference:
Usability

Issue ID: DAC_Link_Appearance_Usability_01

URL: https://dpr-staging-f3c30ff39338.herokuapp.com/camden/planning-process#main
Page title: Help using the Digital Planning Register | Camden Digital Planning Register
Journey: Journey 2
1. Help using the Digital Planning Register
a. Test this page (Including the contents)

Screenshot:

Prior approval

This checks whether the proposal is considered 'permitted development' according to national legislation, and assesses it against specific criteria before it can take place. If the proposal does not receive prior approval, or is no eligible for prior approval, then a planning application needs to be submitted. If the proposal is considered 'permitted development' then it can be done without further planning applications.

This covers a wide range of changes or additions to buildings, including certain changes of use, extensions to buildings, non-domestic solar panels, certain demolitions, etc. You can find out about what is eligible for permitted development by reading the gov.uk guidance on planning.

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Note: Unable to access J2 during retest.

The link, 'the gov.uk guidance on planning' is not styled like other links on the same page nor does the focus indicator conform with GOV.UK Design System recommendations.
As the link text is not distinguishable from adjacent non-link text (e.g., by visual characteristics typical of a link) some people may be unaware that the link is present.

Current code ref(s):

#main > div.govuk-main-wrapper.dpr-page-planning-process > div > div.govuk-grid-column-two-thirds-from-desktop > div:nth-child(4) > div:nth-child(6) > p:nth-child(3) > a

```
<a href="https://www.gov.uk/guidance/when-is-permission-required#What-are-
permitted-development-rights" target="_blank">the gov.uk guidance on planning.</a>
```

Examples of additional instances:

Additional instances of this issue may exist on other pages throughout the website; wherever this issue occurs, they too will need to be resolved.

Solution:

Consider implementing link text consistently through out to help people locate links were they exist. Also, considering implementing a focus indicator as is demonstrated by Understanding focus state styles – GOV.UK Design System.

Hint Text

Hint text does not conform with GOV.UK Design System recommendations.

WCAG Reference:
Usability & GOV.UK Design System requirement

Issue ID: DAC_Hint_Text_Usability_01

URL: https://dpr-staging-f3c30ff39338.herokuapp.com/camden/24-00143-HAPP/submit-comment?page=4&topicIndex=0
Page title: Application 24-00143-HAPP | Camden Digital Planning Register
Journey: Journey 1
5. Tell us what you think
h. Type dummy data into the 'Your details' edit fields

Screenshot:

The hint text (e.g., 'Optional') does not conform with GOV.UK Design System recommendations as it is not programmatically associated with the corresponding input fields. This means that screen reader user may not encounter the associated 'Optional' distinction depending on their method of navigation.

Current code ref(s):

#main > div.govuk-grid-row > div > form > div:nth-child(4)

```
<div class="govuk-form-group ">
  <label class="govuk-label" for="emailAddress">Email address</label>
  <div class="govuk-hint">Optional</div>
  <input class="govuk-input govuk-input--width-20 " id="emailAddress"
spellcheck="false" autocomplete="email" aria-invalid="false" type="email" value=""
name="emailAddress">
</div>
```

#main > div.govuk-grid-row > div > form > div:nth-child(5)

```
<div class="govuk-form-group ">
  <label class="govuk-label" for="telephoneNumber">Telephone number</label>
  <div class="govuk-hint">Optional</div>
  <input class="govuk-input govuk-input--width-20 " id="telephoneNumber"
autocomplete="tel" aria-invalid="false" type="tel" value=""
name="telephoneNumber">
</div>
```

Examples of additional instances:

Additional instances of this issue may exist on other pages throughout the website; wherever this issue occurs, they too will need to be resolved.

Solution:

Consider implementing hint text as is demonstrated by Text input – GOV.UK Design System. For example, apply an aria-describedby="event-name-hint" attribute to the input that corresponds with an id="event-name-hint" attribute applied to the hint text contained (e.g., <div>).

In this instance, however, when asking for optional information, mark the labels of optional fields with '(optional)'. This will help users identify which form fields are mandatory. For more information about asking users questions please refer to Question pages – GOV.UK Design System.

Journey 1

1. Welcome to the Digital Planning Register
   https://dpr-staging-f3c30ff39338.herokuapp.com/
   a. Test this page
   b. Click 'Camden' from the dropdown menu or the link provided on the page

2. Welcome to the Digital Planning Register (Camden)
   a. Test this page
   b. Click the first 'View details' button

3. (Application name)
   a. Test this page
   b. Click 'Comment on this application'

4. What you need to know before you comment
   a. Test this page
   b. Click 'Start now'

5. Tell us what you think
   a. Test these pages
   b. Click either 'Opposed' or 'Neutral' or 'Support' buttons
   c. Click 'Continue'
   d. Tick any option from the 'What topics do you want to comment on?' checkbox
   e. Click 'Continue'
   f. Type dummy data into the 'Comment on the design, size or height of new buildings or extensions' text area
   g. Click 'Continue'
   h. Type dummy data into the 'Your details' edit fields
   i. Tick the 'I consent to Camden Council using my data for the purposes of assessing this planning application' checkbox
   j. Click 'Continue'
   k. Click 'Accept and send'

6. Comment submitted
   a. Test this page

Journey 2

1. Help using the Digital Planning Register
   https://dpr-staging-f3c30ff39338.herokuapp.com/camden/planning-process
   a. Test this page (Including the contents)

Classification of Accessibility Issues

The following scoring system was used to indicate the status of the sites with regards to each W3C WAI checkpoint up to and including Level AA:

Status	Description
Pass (M) Medium Priority **Pass (H) High Priority**	The service meets the requirements of the checkpoint.
Fail (M) Medium Priority	The service fails to meet the requirements against AA criteria measured against WCAG 2.2
Fail (H) High Priority	The service fails to meet the requirements against A criteria measured against WCAG 2.2 and more severe accessibility issues were identified.
Not Applicable (N/A)	No content was found on the service to which the checkpoint would relate.
Out of scope	Areas which fail to meet the requirements against AAA criteria measured against WCAG 2.2 are not in scope for the purposes of this audit.

Principle 1: Perceivable – Information and users interface components must be presentable to users in ways they can perceive.

Non-text Content: 1.1.1 All non-text content that is presented to the user has a text alternative that serves the equivalent purpose. **(Level A)**	**Pass (H)**

Audio-only and Video-only (Pre-recorded):
1.2.1 For pre-recorded audio-only and pre-recorded video-only media, the following are true, except when the audio or video is a media alternative for text and is clearly labelled as such:
• **Pre-recorded Audio-only**
   An alternative for time-based media is provided that presents equivalent information for pre-recorded audio-only content.
• **Pre-recorded Video-only**
   Either an alternative for time-based media or an audio track is provided that presents equivalent information for pre-recorded video-only content.
(Level A)
	Not Applicable (N/A)

Captions (Pre-recorded): 1.2.2 Captions are provided for all pre-recorded audio content in synchronized media, except when the media is a media alternative for text and is clearly labelled as such. **(Level A)**	**Not Applicable (N/A)**
Audio Description or Media Alternative (Pre-recorded): 1.2.3 An alternative for time-based media or audio description of the pre-recorded video content is provided for synchronized media, except when the media is a media alternative for text and is clearly labelled as such. **(Level A)**	**Not Applicable (N/A)**
Captions (Live): 1.2.4 Captions are provided for all live audio content in synchronized media. **(Level AA)**	**Not Applicable (N/A)**
Audio Description (Pre-recorded): 1.2.5 Audio description is provided for all pre-recorded video content in synchronized media. **(Level AA)**	**Not Applicable (N/A)**
Sign Language (Pre-recorded): 1.2.6 Sign language interpretation is provided for all pre-recorded audio content in synchronized media. **(Level AAA)**	**Out of scope**

Extended Audio Description (Pre-recorded): 1.2.7 Where pauses in foreground audio are insufficient to allow audio descriptions to convey the sense of the video, extended audio description is provided for all pre-recorded video content in synchronized media. **(Level AAA)**	**Out of scope**
Media Alternative (Pre-recorded): 1.2.8 An alternative for time-based media is provided for all pre-recorded synchronized media and for all pre-recorded video-only media. **(Level AAA)**	**Out of scope**
Audio-only (Live): 1.2.9 An alternative for time-based media that presents equivalent information for live audio-only content is provided. **(Level AAA)**	**Out of scope**
Info and Relationships: 1.3.1 Information, structure, and relationships conveyed through presentation can be programmatically determined or are available in text. (**Level A**)	**Pass (H)**
Meaningful Sequence: 1.3.2 When the sequence in which content is presented affects its meaning, a correct reading sequence can be programmatically determined. **(Level A)**	**Pass (H)**
Sensory Characteristics: 1.3.3 Instructions provided for understanding and operating content do not rely solely on sensory characteristics of components such as shape, size, visual location, orientation, or sound. **(Level A)**	**Pass (H)**
Orientation: 1.3.4 Content does not restrict its view and operation to a single display orientation, such as portrait or landscape, unless a specific display orientation is essential. Note: Examples where a particular display orientation may be essential are a bank check, a piano application, slides for a projector or television, or virtual reality content where binary display orientation is not applicable. **(Level AA)**	**Pass (M)**

Identify Input Purpose: 1.3.5 The purpose of each input field collecting information about the user can be programmatically determined when: • The input field serves a purpose identified in the Input Purposes for user interface components section; and • The content is implemented using technologies with support for identifying the expected meaning for form input data. **(Level AA)**	**Pass (M)**
Identify Purpose: 1.3.6 In content implemented using mark-up languages, the purpose of User Interface Components, icons, and regions can be programmatically determined. **(Level AAA)**	**Out of scope**
Use of Colour: 1.4.1 Colour is not used as the only visual means of conveying information, indicating an action, prompting a response, or distinguishing a visual element. **(Level A)**	**Pass (H)**
Audio Control: 1.4.2 If any audio on a Web page plays automatically for more than 3 seconds, either a mechanism is available to pause or stop the audio, or a mechanism is available to control audio volume independently from the overall system volume level. **(Level A)**	**Not Applicable (N/A)**

Contrast (Minimum):
1.4.3 The visual presentation of text and images of text has a contrast ratio of at least 4.5:1, except for the following:
• **Large Text**
  Large-scale text and images of large-scale text have a contrast ratio of at least 3:1;
• **Incidental**
  Text or images of text that are part of an inactive user interface component, that are pure decoration, that are not visible to anyone, or that are part of a picture that contains significant other visual content, have no contrast requirement.
• **Logotypes**
  Text that is part of a logo or brand name has no contrast requirement.
(Level AA)
	Pass (M)

Resize text: 1.4.4 Except for captions and images of text, text can be resized without assistive technology up to 200 percent without loss of content or functionality. **(Level AA)**	**Pass (M)**

Images of Text:
1.4.5 If the technologies being used can achieve the visual presentation, text is used to convey information rather than images of text except for the following:
• **Customizable**
  The image of text can be visually customized to the user's requirements;
• **Essential**
  A particular presentation of text is essential to the information being conveyed.
Note: Logotypes (text that is part of a logo or brand name) are considered essential.
(Level AA)
	Pass (M)

Contrast (Enhanced):
1.4.6 The visual presentation of text and images of text has a contrast ratio of at least 7:1, except for the following:
• **Large Text**
  Large-scale text and images of large-scale text have a contrast ratio of at least 4.5:1;
• **Incidental**
  Text or images of text that are part of an inactive user interface component, that are pure decoration, that are not visible to anyone, or that are part of a picture that contains significant other visual content, have no contrast requirement.
• **Logotypes**
  Text that is part of a logo or brand name has no contrast requirement.
(Level AAA)
	Out of scope

Low or No Background Audio:
1.4.7 For pre-recorded audio-only content that (1) contains primarily speech in the foreground, (2) is not an audio CAPTCHA or audio logo, and (3) is not vocalization intended to be primarily musical expression such as singing or rapping, at least one of the following is true:
• **No Background**
  The audio does not contain background sounds.
• **Turn Off**
  The background sounds can be turned off.
• **20 dB**
  The background sounds are at least 20 decibels lower than the foreground speech content, with the exception of occasional sounds that last for only one or two seconds.
 	
Note: Per the definition of "decibel," background sound that meets this requirement will be approximately four times quieter than the foreground speech content.
(Level AAA)
	Out of scope

Visual Presentation: 1.4.8 For the visual presentation of blocks of text, a mechanism is available to achieve the following: - Foreground and background colours can be selected by the user. - Width is no more than 80 characters or glyphs (40 if CJK). - Text is not justified (aligned to both the left and the right margins). - Line spacing (leading) is at least space-and-a-half within paragraphs, and paragraph spacing is at least 1.5 times larger than the line spacing. - Text can be resized without assistive technology up to 200 percent in a way that does not require the user to scroll horizontally to read a line of text on a full-screen window. **(Level AAA)**	**Out of scope**
Images of Text (No Exception): 1.4.9 Images of text are only used for pure decoration or where a particular presentation of text is essential to the information being conveyed. **Note:** Logotypes (text that is part of a logo or brand name) are considered essential. **(Level AAA)**	**Out of scope**
Reflow: 1.4.10 Content can be presented without loss of information or functionality, and without requiring scrolling in two dimensions for: - Vertical scrolling content at a width equivalent to 320 CSS pixels; - Horizontal scrolling content at a height equivalent to 256 CSS pixels. Except for parts of the content which require two-dimensional layout for usage or meaning. **Note:** 320 CSS pixels is equivalent to a starting viewport width of 1280 CSS pixels wide at 400% zoom. For web content which are designed to scroll horizontally (e.g. with vertical text), the 256 CSS pixels is equivalent to a starting viewport height of 1024px at 400% zoom. **Note:** Examples of content which requires two-dimensional layout are images required for understanding (such as maps and diagrams), video, games, presentations, data tables (not individual cells), and interfaces where it is necessary to keep toolbars in view while manipulating content. It is acceptable to provide two-dimensional scrolling for such parts of the content. **(Level AA)**	**Pass (M)**

Non-text Contrast: 1.4.11 The visual presentation of the following have a contrast ratio of at least 3:1 against adjacent colour(s): • **User Interface Components** 　Visual information required to identify user interface components and states, except for inactive components or where the appearance of the component is determined by the user agent and not modified by the author; • **Graphical Objects** 　Parts of graphics required to understand the content, except when a particular presentation of graphics is essential to the information being conveyed. **(Level AA)**	**Pass (M)**
Text Spacing: 1.4.12 In content implemented using markup languages that support the following text style properties, no loss of content or functionality occurs by setting all of the following and by changing no other style property: 　• Line height (line spacing) to at least 1.5 times the font size; 　• Spacing following paragraphs to at least 2 times the font size; 　• Letter spacing (tracking) to at least 0.12 times the font size; 　• Word spacing to at least 0.16 times the font size. Exception: Human languages and scripts that do not make use of one or more of these text style properties in written text can conform using only the properties that exist for that combination of language and script. **(Level AA)**	**Pass (M)**

Content on Hover or Focus: 1.4.13 Where receiving and then removing pointer hover or keyboard focus triggers additional content to become visible and then hidden, the following are true: • **Dismissible** A mechanism is available to dismiss the additional content without moving pointer hover or keyboard focus, unless the additional content communicates an input error or does not obscure or replace other content; • **Hoverable** If pointer hover can trigger the additional content, then the pointer can be moved over the additional content without the additional content disappearing; • **Persistent** The additional content remains visible until the hover or focus trigger is removed, the user dismisses it, or its information is no longer valid. **Exception:** The visual presentation of the additional content is controlled by the user agent and is not modified by the author. **Note:** Examples of additional content controlled by the user agent include browser tooltips created through use of the HTML title attribute. **Note:** Custom tooltips, sub-menus, and other nonmodal popups that display on hover and focus are examples of additional content covered by this criterion. **(Level AA)**	**Pass (M)**

Principle 2: Operable – User interface components and navigation must be operable.

Keyboard: 2.1.1 All functionality of the content is operable through a keyboard interface without requiring specific timings for individual keystrokes, except where the underlying function requires input that depends on the path of the user's movement and not just the endpoints. **Note:** This exception relates to the underlying function, not the input technique. For example, if using handwriting to enter text, the input technique (handwriting) requires path-dependent input but the underlying function (text input) does not. **Note:** This does not forbid and should not discourage providing mouse input or other input methods in addition to keyboard operation. **(Level A)**	**Pass (H)**
No Keyboard Trap: 2.1.2 If keyboard focus can be moved to a component of the page using a keyboard interface, then focus can be moved away from that component using only a keyboard interface, and, if it requires more than unmodified arrow or tab keys or other standard exit methods, the user is advised of the method for moving focus away. **Note:** Since any content that does not meet this success criterion can interfere with a user's ability to use the whole page, all content on the Web page (whether it is used to meet other success criteria or not) must meet this success criterion. See Conformance Requirement 5: Non-Interference. **(Level A)**	**Pass (H)**
Keyboard (No Exception): 2.1.3 All functionality of the content is operable through a keyboard interface without requiring specific timings for individual keystrokes. **(Level AAA)**	**Out of scope**
Character Key Shortcuts: 2.1.4 If a keyboard shortcut is implemented in content using only letter (including upper- and lower-case letters), punctuation, number, or symbol characters, then at least one of the following is true: • **Turn off** 　A mechanism is available to turn the shortcut off; • **Remap** 　A mechanism is available to remap the shortcut to include one or more non-printable keyboard keys (e.g., Ctrl, Alt); • **Active only on focus** 　The keyboard shortcut for a user interface component is only active when that component has focus. **(Level A)**	**Not Applicable (N/A)**

Timing Adjustable:
 	
2.2.1 For each time limit that is set by the content, at least one of the following is true:
 	
• **Turn off**
  The user is allowed to turn off the time limit before encountering it; or
 	
• **Adjust**
  The user is allowed to adjust the time limit before encountering it over a wide range that is at least ten times the length of the default setting; or
 	
• **Extend**
  The user is warned before time expires and given at least 20 seconds to extend the time limit with a simple action (for example, "press the space bar"), and the user is allowed to extend the time limit at least ten times; or
 	
• **Real-time Exception**
  The time limit is a required part of a real-time event (for example, an auction), and no alternative to the time limit is possible; or
 	
• **Essential Exception**
  The time limit is essential and extending it would invalidate the activity; or
 	
• **20 Hour Exception**
  The time limit is longer than 20 hours.
 	
Note: This success criterion helps ensure that users can complete tasks without unexpected changes in content or context that are a result of a time limit. This success criterion should be considered in conjunction with Success Criterion 3.2.1, which puts limits on changes of content or context as a result of user action.
(Level A)
	Not Applicable (N/A)

Pause, Stop, Hide: 2.2.2 For moving, blinking, scrolling, or auto-updating information, all of the following are true: • **Moving, blinking, scrolling** For any moving, blinking or scrolling information that (1) starts automatically, (2) lasts more than five seconds, and (3) is presented in parallel with other content, there is a mechanism for the user to pause, stop, or hide it unless the movement, blinking, or scrolling is part of an activity where it is essential; and • **Auto-updating** For any auto-updating information that (1) starts automatically and (2) is presented in parallel with other content, there is a mechanism for the user to pause, stop, or hide it or to control the frequency of the update unless the auto-updating is part of an activity where it is essential. **Note:** For requirements related to flickering or flashing content, refer to Guideline 2.3. **Note:** Since any content that does not meet this success criterion can interfere with a user's ability to use the whole page, all content on the Web page (whether it is used to meet other success criteria or not) must meet this success criterion. See Conformance Requirement 5: Non-Interference. **Note:** Content that is updated periodically by software or that is streamed to the user agent is not required to preserve or present information that is generated or received between the initiation of the pause and resuming presentation, as this may not be technically possible, and in many situations could be misleading to do so. **Note:** An animation that occurs as part of a preload phase or similar situation can be considered essential if interaction cannot occur during that phase for all users and if not indicating progress could confuse users or cause them to think that content was frozen or broken. **(Level A)**	**Not Applicable (N/A)**
No Timing: 2.2.3 Timing is not an essential part of the event or activity presented by the content, except for non-interactive synchronized media and real-time events. **(Level AAA)**	**Out of scope**
Interruptions: 2.2.4 Interruptions can be postponed or suppressed by the user, except interruptions involving an emergency. **(Level AAA)**	**Out of scope**
Re-authenticating: 2.2.5 When an authenticated session expires, the user can continue the activity without loss of data after re-authenticating. **(Level AAA)**	**Out of scope**

Timeouts: 2.2.6 Users are warned of the duration of any user inactivity that could cause data loss, unless the data is preserved for more than 20 hours when the user does not take any actions. **Note:** Privacy regulations may require explicit user consent before user identification has been authenticated and before user data is preserved. In cases where the user is a minor, explicit consent may not be solicited in most jurisdictions, countries or regions. Consultation with privacy professionals and legal counsel is advised when considering data preservation as an approach to satisfy this success criterion. **(Level AAA)**	**Out of scope**
Three Flashes or Below Threshold: 2.3.1 Web pages do not contain anything that flashes more than three times in any one second period, or the flash is below the general flash and red flash thresholds. **Note:** Since any content that does not meet this success criterion can interfere with a user's ability to use the whole page, all content on the Web page (whether it is used to meet other success criteria or not) must meet this success criterion. See Conformance Requirement 5: Non-Interference. **(Level A)**	**Pass (H)**
Three Flashes: 2.3.2 Web pages do not contain anything that flashes more than three times in any one second period. **(Level AAA)**	**Out of scope**
Animation from Interactions: 2.3.3 Motion animation triggered by interaction can be disabled, unless the animation is essential to the functionality or the information being conveyed. **(Level AAA)**	**Out of scope**
Bypass Blocks: 2.4.1 A mechanism is available to bypass blocks of content that are repeated on multiple Web pages. **(Level A)**	**Pass (H)**
Page Titled: 2.4.2 Web pages have titles that describe topic or purpose. **(Level A)**	**Pass (H)**
Focus Order: 2.4.3 If a Web page can be navigated sequentially and the navigation sequences affect meaning or operation, focusable components receive focus in an order that preserves meaning and operability.. **(Level A)**	**Pass (H)**

Link Purpose (In Context): 2.4.4 The purpose of each link can be determined from the link text alone or from the link text together with its programmatically determined link context, except where the purpose of the link would be ambiguous to users in general. **(Level A)**	**Pass (H)**
Multiple Ways: 2.4.5 More than one way is available to locate a Web page within a set of Web pages except where the Web Page is the result of, or a step in, a process. **(Level AA)**	**Pass (M)**
Headings and Labels: 2.4.6 Headings and labels describe topic or purpose. **(Level AA)**	**Pass (M)**
Focus Visible: 2.4.7 Any keyboard operable user interface has a mode of operation where the keyboard focus indicator is visible. **(Level AA)**	**Pass (M)**
Location: 2.4.8 Information about the user's location within a set of Web pages is available. **(Level AAA)**	**Out of scope**
Link Purpose (Link Only): 2.4.9 A mechanism is available to allow the purpose of each link to be identified from link text alone, except where the purpose of the link would be ambiguous to users in general. **(Level AAA)**	**Out of scope**
Section Headings: 2.4.10 Section headings are used to organize the content. **Note:** "Heading" is used in its general sense and includes titles and other ways to add a heading to different types of content. **Note:** This success criterion covers sections within writing, not user interface components. User interface components are covered under Success Criterion 4.1.2. **(Level AAA)**	**Out of scope**
Focus Not Obscured (Minimum): (WCAG 2.2) 2.4.11 When a user interface component receives keyboard focus, the component is not entirely hidden due to author-created content. **(Level AA) [New 2.2]**	**Pass (M)**
Focus Not Obscured (Enhanced): (WCAG 2.2) 2.4.12 When a user interface component receives keyboard focus, no part of the component is hidden by author-created content. **(Level AAA) [New 2.2]**	**Out of scope**

Focus Appearance: (WCAG 2.2) 2.4.13 When the keyboard focus indicator is visible, an area of the focus indicator meets all the following: • is at least as large as the area of a 2 CSS pixel thick perimeter of the unfocused component or sub-component, and • has a contrast ratio of at least 3:1 between the same pixels in the focused and unfocused states. Exceptions: • The focus indicator is determined by the user agent and cannot be adjusted by the author, or • The focus indicator and the indicator's background color are not modified by the author. **Note** What is perceived as the user interface component or sub-component (to determine the perimeter) depends on its visual presentation. The visual presentation includes the component's visible content, border, and component-specific background. It does not include shadow and glow effects outside the component's content, background, or border. **Note** Examples of sub-components that may receive a focus indicator are menu items in an opened drop-down menu, or focusable cells in a grid. **Note** Contrast calculations can be based on colors defined within the technology (such as HTML, CSS and SVG). Pixels modified by user agent resolution enhancements and anti-aliasing can be ignored. **(Level AAA) [New 2.2]**	**Out of scope**

Pointer Gestures: 2.5.1 All functionality that uses multipoint or path-based gestures for operation can be operated with a single pointer without a path-based gesture, unless a multipoint or path-based gesture is essential. **Note:** This requirement applies to web content that interprets pointer actions (i.e. this does not apply to actions that are required to operate the user agent or assistive technology). **(Level A)**	**Pass (H)**

Pointer Cancellation:
2.5.2 For functionality that can be operated using a single pointer, at least one of the following is true:
• **No Down-Event**
   The down-event of the pointer is not used to execute any part of the function;
• **Abort or Undo**
   Completion of the function is on the up-event, and a mechanism is available to abort the function before completion or to undo the function after completion;
• **Up Reversal**
   The up-event reverses any outcome of the preceding down-event;
• **Essential**
   Completing the function on the down-event is essential.
 	
Note: Functions that emulate a keyboard or numeric keypad key press are considered essential.
 	
Note: This requirement applies to web content that interprets pointer actions (i.e. this does not apply to actions that are required to operate the user agent or assistive technology).
(Level A)
	Pass (H)

Label in Name: 2.5.3 For user interface components with labels that include text or images of text, the name contains the text that is presented visually. **Note:** A best practice is to have the text of the label at the start of the name. **(Level A)**	**Pass (H)**

Motion Actuation:
2.5.4 Functionality that can be operated by device motion or user motion can also be operated by user interface components and responding to the motion can be disabled to prevent accidental actuation, except when:
• **Supported Interface**
  The motion is used to operate functionality through an accessibility supported interface;
• **Essential**
  The motion is essential for the function and doing so would invalidate the activity.
(Level A)
	Pass (H)

Target Size (Enhanced)
2.5.5 The size of the target for pointer inputs is at least 44 by 44 CSS pixels except when:
• **Equivalent**
  The target is available through an equivalent link or control on the same page that is at least 44 by 44 CSS pixels;
• **Inline**
  The target is in a sentence or block of text;
• **User Agent Control**
  The size of the target is determined by the user agent and is not modified by the author;
• **Essential**
  A particular presentation of the target is essential to the information being conveyed.
(Level AAA)
	Out of scope

Concurrent Input Mechanisms : 2.5.6 Web content does not restrict use of input modalities available on a platform except where the restriction is essential, required to ensure the security of the content, or required to respect user settings. **(Level AAA)**	**Out of scope**
Dragging Movements: (WCAG 2.2) 2.5.7 All functionality that uses a dragging movement for operation can be achieved by a single pointer without dragging, unless dragging is essential or the functionality is determined by the user agent and not modified by the author. **Note:** This requirement applies to web content that interprets pointer actions (i.e. this does not apply to actions that are required to operate the user agent or assistive technology). **(Level AA) [New 2.2]**	**Not Applicable (N/A)**

Target Size (Minimum): (WCAG 2.2) 2.5.8 The size of the target for pointer inputs is at least 24 by 24 CSS pixels, except where: • **Spacing:** The target does not overlap any other target and has a target offset of at least 24 CSS pixels to every adjacent target; • **Equivalent:** The function can be achieved through a different control on the same page that meets this criterion. • **Inline:** The target is in a sentence, or is in a bulleted or numbered list, or its size is otherwise constrained by the line-height of non-target text; • **User agent control:** The size of the target is determined by the user agent and is not modified by the author; • **Essential:** A particular presentation of the target is essential or is legally required for the information being conveyed; **Note:** Targets that allow for values to be selected spatially based on position within the target are considered one target for the purpose of the success criterion. Examples include sliders with granular values, color pickers displaying a gradient of colors, or editable areas where you position the cursor. **Note:** For inline targets the line-height should be interpreted as perpendicular to the flow of text. For example, in a language displayed top to bottom, the line-height would be horizontal. **(Level AA) [New 2.2]**	**Pass (M)**

Principle 3: Understandable – Information and the operation of user interface must be understandable.

Language of Page: 3.1.1 The default human language of each Web page can be programmatically determined. **(Level A)**	**Pass (H)**
Language of Parts: 3.1.2 The human language of each passage or phrase in the content can be programmatically determined except for proper names, technical terms, words of indeterminate language, and words or phrases that have become part of the vernacular of the immediately surrounding text. **(Level AA)**	**Pass (M)**
Unusual Words: 3.1.3 A mechanism is available for identifying specific definitions of words or phrases used in an unusual or restricted way, including idioms and jargon. **(Level AAA)**	**Out of scope**
Abbreviations: 3.1.4 A mechanism for identifying the expanded form or meaning of abbreviations is available. **(Level AAA)**	**Out of scope**
Reading Level: 3.1.5 When text requires reading ability more advanced than the lower secondary education level after removal of proper names and titles, supplemental content, or a version that does not require reading ability more advanced than the lower secondary education level, is available. **(Level AAA)**	**Out of scope**
Pronunciation: 3.1.6 A mechanism is available for identifying specific pronunciation of words where meaning of the words, in context, is ambiguous without knowing the pronunciation. **(Level AAA)**	**Out of scope**
On Focus: 3.2.1 When any user interface component receives focus, it does not initiate a change of context. **(Level A)**	**Pass (H)**

On Input: 3.2.2 Changing the setting of any user interface component does not automatically cause a change of context unless the user has been advised of the behaviour before using the component. **(Level A)**	**Pass (H)**
Consistent Navigation: 3.2.3 Navigational mechanisms that are repeated on multiple Web pages within a set of Web pages occur in the same relative order each time they are repeated, unless a change is initiated by the user. **(Level AA)**	**Pass (M)**
Consistent Identification: 3.2.4 Components that have the same functionality within a set of Web pages are identified consistently. **(Level AA)**	**Pass (M)**
Change on Request: 3.2.5 Changes of context are initiated only by user request or a mechanism is available to turn off such changes. **(Level AAA)**	**Out of scope**
Consistent Help: (WCAG 2.2) 3.2.6 If a web page contains any of the following help mechanisms, and those mechanisms are repeated on multiple web pages within a set of web pages, they occur in the same relative order to other page content, unless a change is initiated by the user: • Human contact details; • Human contact mechanism; • Self-help option; • A fully automated contact mechanism. **Note:** Help mechanisms may be provided directly on the page, or may be provided via a direct link to a different page containing the information. **Note:** For this Success Criterion, the same relative order can be thought of as how the content is ordered when the page is serialized. The visual position of a help mechanism is likely to be consistent across pages for the same page variation (e.g., CSS break-point). The user can initiate a change, such as changing the page's zoom or orientation, which may trigger a different page variation. This criterion is concerned with relative order across pages displayed in the same page variation (e.g., same zoom level and orientation). **(Level A) [New 2.2]**	**Pass (H)**
Error Identification: 3.3.1 If an input error is automatically detected, the item that is in error is identified and the error is described to the user in text. **(Level A)**	**Pass (H)**

Labels or Instructions: 3.3.2 Labels or instructions are provided when content requires user input. **(Level A)**	**Pass (H)**
Error Suggestion: 3.3.3 If an input error is automatically detected and suggestions for correction are known, then the suggestions are provided to the user, unless it would jeopardize the security or purpose of the content. **(Level AA)**	**Pass (M)**
Error Prevention (Legal, Financial, Data): 3.3.4 For Web pages that cause legal commitments or financial transactions for the user to occur, that modify or delete user-controllable data in data storage systems, or that submit user test responses, at least one of the following is true: • **Reversible:** Submissions are reversible. • **Checked:** Data entered by the user is checked for input errors and the user is provided an opportunity to correct them. • **Confirmed:** A mechanism is available for reviewing, confirming, and correcting information before finalizing the submission. **(Level AA)**	**Not Applicable (N/A)**
Help: 3.3.5 Context-sensitive help is available. Provide instructions and cues in context to help inform completion and submission. **(Level AAA)**	**Out of scope**
Error Prevention (All): 3.3.6 For Web pages that require the user to submit information, at least one of the following is true: • **Reversible** Submissions are reversible. • **Checked** Data entered by the user is checked for input errors and the user is provided an opportunity to correct them. • **Confirmed** A mechanism is available for reviewing, confirming, and correcting information before finalizing the submission. **(Level AAA)**	**Out of scope**

Redundant Entry: (WCAG 2.2) 3.3.7 Information previously entered by or provided to the user that is required to be entered again in the same process is either: • auto-populated, or • available for the user to select. **Except when**: • re-entering the information is essential, • the information is required to ensure the security of the content, or • previously entered information is no longer valid. **(Level A) [New 2.2]**	**Pass (H)**
Accessible Authentication: (WCAG 2.2) 3.3.8 A cognitive function test (such as remembering a password or solving a puzzle) is not required for any step in an authentication process unless that step provides at least one of the following: • **Alternative:** Another authentication method that does not rely on a cognitive function test. • **Mechanism:** A mechanism is available to assist the user in completing the cognitive function test. • **Object Recognition:** The cognitive function test is to recognize objects. • **Personal Content:** The cognitive function test is to identify non-text content the user provided to the website. **Note:** "Object recognition" and "Personal content" may be represented by images, video, or audio. **Note:** Examples of mechanisms that satisfy this criterion include: 1. support for password entry by password managers to reduce memory need, and 2. copy and paste to reduce the cognitive burden of re-typing. **(Level AA) [New 2.2]**	**Pass (M)**
Accessible Authentication (Enhanced): (WCAG 2.2) 3.3.9 A cognitive function test (such as remembering a password or solving a puzzle) is not required for any step in an authentication process unless that step provides at least one of the following: **Alternative:** Another authentication method that does not rely on a cognitive function test. **Mechanism:** A mechanism is available to assist the user in completing the cognitive function test. **(Level AAA) [New 2.2]**	**Out of scope**

Principle 4: Robust – Content must be robust enough that it can be interpreted reliably by a wide variety of user agents, including assistive technologies	
Parsing: WCAG 2.2 4.1.1 In content implemented using mark-up languages, elements have complete start and end tags, elements are nested according to their specifications, elements do not contain duplicate attributes, and any IDs are unique, except where the specifications allow these features. **Note:** Start and end tags that are missing a critical character in their formation, such as a closing angle bracket or a mismatched attribute value quotation mark are not complete. **(Level A) [Changed 2.2]** **Note: Change in 2.2: Obsolete and removed** This criterion was originally adopted to address problems that Assistive Technology had directly parsing HTML. Assistive Technology no longer has any need to directly parse HTML and, consequently, these problems no longer exists. Accessibility errors failed by this criterion also fail other criteria. This criterion no longer has utility and is removed; the reference has been left for historical purposes to show the original intent. **Note:** This criterion has been removed from WCAG 2.2. In WCAG 2.1 and 2.0, Success Criterion 4.1.1 Parsing should be considered as **always satisfied** for any content using HTML or XML.	**(N/A)**
Name, Role, Value: 4.1.2 For all user interface components (including but not limited to: form elements, links and components generated by scripts), the name and role can be programmatically determined; states, properties, and values that can be set by the user can be programmatically set; and notification of changes to these items is available to user agents, including assistive technologies. **Note:** This success criterion is primarily for Web authors who develop or script their own user interface components. For example, standard HTML controls already meet this success criterion when used according to specification. **(Level A)**	**Pass (H)**
Status Messages 4.1.3 In content implemented using markup languages, status messages can be programmatically determined through role or properties such that they can be presented to the user by assistive technologies without receiving focus. **(Level AA)**	**Pass (M)**

The table below lists the IDs of all issues encountered in the original audit. It highlights which issues remain unresolved, which have been resolved, and includes any additional notes for your reference.

Retest 1

Issue ID	Date retested	Retested By	Resolved/ Remains	Additional Notes
Issue ID: DAC_Labels_or_Instructions_01	28/01/25	Kirsty Mander (KM)	Resolved	Select element removed
Issue ID: DAC_On_Input_01	28/01/25	KM	Resolved	Select element removed
Issue ID: DAC_Links_Purpose_In_Context_01	28/01/25	KM	Resolved	Button reflects the Application reference
Issue ID: DAC_Information_and_Relationships_01	28/01/25	KM	Resolved	Heading markup has been removed
Issue ID: DAC_Information_and_Relationships_02	28/01/25	KM	Resolved	Description list markup present
Issue ID: DAC_Focus_Order_01	28/01/25	KM	Resolved	Links function as expected
Issue ID: DAC_Page_Titled_01	28/01/25	KM	Resolved	Page title reflects page content
Issue ID: DAC_Bypass_Blocks_02	28/01/25	KM	Resolved	Main content begins after phase banner and 'Back' link
Issue ID: DAC_Change_on_Request_01	28/01/25	KM	Resolved	Link has been removed
Issue ID: DAC_Colour_Contrast_Enhanced_01	28/01/25	KM	Resolved	Colour contrast passes
Issue ID: DAC_Images_of_Text_Usability_01	28/01/25	KM	Resolved	Logos are exempt.
Issue ID: DAC_Radios_Usability_01	28/01/25	KM	Resolved	GDS button pattern has been implemented
Issue ID: DAC_Error_Summary_Usability_01	28/01/25	KM	Remains	No change made

Issue ID	Date			
Issue ID: DAC_Link_Appearance_Usability_01	28/01/25	KM	N/A	Unable to access J2
Issue ID: DAC_Link_Appearance_Usability_02	28/01/25	KM	Resolved	Link appearance consistent throughout
Issue ID: DAC_Check_Answers_Usability_01	28/01/25	KM	Resolved	Page behaves as expected
Issue ID: DAC_Hint_Text_Usability_01	28/01/25	KM	Remains	Not conveyed to screen readers out of context
DAC_Label_In_Name_01_NEW	28/01/25	KM	New	New issue

Retest 2

Issue ID	Date retested	Retested By	Resolved/ Remains	Additional Notes
DAC_Label_In_Name_01_NEW	25/02/25	Kirsty Mander (KM)	Resolved	Resolved
DAC_Colour_Contrast_Enhanced_01	25/02/25	KM	Resolved	This is now an image, which surpasses the different requirement for contrast of non-text elements of 3:1
Issue ID: DAC_Link_Appearance_Usability_01	25/02/25	KM	N/A	Unable to access J2
Issue ID: DAC_Hint_Text_Usability_01	25/02/25	KM	Remains	Not conveyed to screen readers out of context

The Process

The service is measured against the Web Accessibility Initiative's (WAI) Web Content Accessibility Guidelines 2.2 to give accurate feedback on any non-compliant issues. To attain our accreditation all A and AA criteria must be achieved.

To give a more accurate review of the service the DAC team employ two differing testing processes.

The first is a manual technical audit using automated tools and the second a dedicated team of user testers with differing disabilities test using a range of adaptive technologies. The findings of both testing teams are then combined to give the client far more accurate feedback on the service.

By using the testing team in conjunction with an automated procedure a more accurate set of results are made available.

This report combines technical auditing with disabled user feedback. The test does not list each specific area that requires change but highlights patterns of problems where they exist. Each section of the report includes a qualifying statement of pass, fail or recommendation to help developers quickly identify which parts of the service need the most urgent attention.

CRITERIA

High Priority

The digital product has one or more issues that urgently need remediation. There will be a list of actions that the developers need to address to make sure that the product is functional for users of assistive technology.

Medium Priority

The digital product has one or more issues that need remediation before meeting the WCAG 2.2 AA Standard. There will be a list of actions that the developers need to address to make sure that the product meets the expectations of the DAC testing team.

Low Priority

The digital product has one or more issues that would cause minor barriers to users of assistive technology. While not necessary to meet the WCAG 2.2 AA Standard, these issues affect users negatively and should be remediated.

Usability

The digital product may have one or more issues that could cause minor difficulties to users of assistive technology. While not necessary to meet the WCAG 2.2 AA Standard, these issues were found to hinder users.

DAC Testing Procedure

The service is tested by a team of experienced auditors and analysts, many of who are disabled individuals and users of adaptive technology. The combination of subjective pan-disability user feedback and comprehensive technical auditing allows us to measure how the service performs technically and practically, thereby offering an essential added dimension to our test results that other methods of testing cannot provide.

User Testing

Manual accessibility checking was conducted by a team of disabled individuals, using a range of adaptive technologies (hardware and software designed to facilitate the use of computers by people with disabilities). This may include:

NVDA: a screen reader and application used by those who are blind.

ZoomText: a magnification application used by those with low vision.

JAWS: a screen reader used by blind people to access pages.

Dragon Naturally Speaking: voice activated software used by those that do not use a conventional input device such as a keyboard or mouse.

Switch Access: used by those with severe mobility impairments to input commands to a computer.

Keyboard Only: some users with mobility impairments have difficulty making precise movements required by pointing devices such as a mouse; therefore, a keyboard is used as the exclusive input device.

Readability: Manual checks were made to assess the suitability of a page for those with colour blindness and dyslexia.

Deaf/Hard of hearing: Manual checks were made to assess the suitability of a page for those with hearing impairments.

Learning difficulties: Manual checks were made to assess the suitability of a page for those with learning difficulties.

Reflow: tests with screen size of 1280 x 1024px, at 400% browser magnification

Text Spacing: tests with larger Line height, and larger Paragraph, Word and Letter spacing.

Technical Auditing

Technical auditing involves the experienced application of a number of technical auditing and standards compliance assessment tools. This combined with an extensive knowledge of WCAG, its application and wider global practice provides the DAC service with further credibility and quality.