



Accessibility Testing Report



Date:	11/03/2020
Client:	Scottish Information Commissioner
Project Name:	Accessibility Audit
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ISO 9001



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Summary

A total of 19 pages have been tested against the WCAG 2.1 Level AA standard during our session. Outside of the standard Level A and Level AA test execution, a total of 5 client provided user journeys have been conducted to test the website's usability across a number of assistive technology combinations. In addition to this, an automated accessibility site crawl has been carried out against the full website and the results have been analysed and any issues raised within the tracker.

During our audit, 38 issues have been raised, many of which relate to HTML validation and heading structure. A number of issues have been raised relating to decorative imagery containing alternative text. It is expected that images that do not convey content, are decorative, or with content that is already conveyed in text are given null alternative text (`alt=""`) or implemented as CSS backgrounds. It has also been suggested that non-decorative images have a more descriptive alternative text.

The current heading hierarchy is deemed to be incorrect with multiple headings being skipped. Headings communicate the organisation of the content on the page and users of assistive technologies can use them to provide in-page navigation.

It was observed that when navigating the page with a keyboard in conjunction with a screen reader, the tab order is currently illogical. It was noted across multiple pages that the user is incorrectly tabbed to the search field and 'Go' CTA prior to being tabbed to the 'Text size' and 'Print page' CTA's. In relation to this, the user is not tabbed to expanded content and instead has to tab the full page before being tabbed to the content.

Multiple areas of copy currently have insufficient contrast against its background. It is expected that for the visual presentation of text and images of text a contrast ratio of at least 4.5:1 is achieved. It is also noted that user interface components and graphical objects do not meet the minimum contrast ratio of 3:1.

When reviewing the code behind forms, form buttons do not have a descriptive value and currently lack an accessible name. It is also noted that form fields lack the 'autocomplete' attribute. By implementing the 'autocomplete' attribute, this will benefit users with dexterity disabilities who have trouble typing.

To conclude our accessibility audit, a total of 38 tickets have been raised within the tracker.

Test Details	
Target Template URL(s):	<ul style="list-style-type: none"> ● Homepage ● Decisions Database ● Appeal Portal ● Statistics Portal ● A-Z of authorities ● Freedom of Information (FOI): at a glance ● What are my rights? ● Decision page ● Registration ● Slideshow ● Authority Listings ● Voluntary sector resources ● Briefings and guidance ● Decisions Round-up ● Making an appeal ● FOI Law in Scotland ● FOI and EIR Statistics Database ● The Freedom of Information (Scotland) Act 2002 ● Guide to information available through the Commissioner's publication scheme
Test Environment:	Windows 10, Chrome 80

Test Details	
Issue Tracker URL:	https://zoonou.mydone.com/issuetracker/projects/79940
Top 5 Issues of Concern:	
1:	#24: [A11y] 2.1.1 Keyboard – Unable to Tab to All User Interface Components
2:	#3: [A11y] 1.1.1 Non Text Content – Decorative Imagery Contains Inappropriate Alternative Attributes
3:	#13: [A11y] 2.4.1 Bypass Blocks – Heading Structure Incorrect
4:	#28: [A11y] 4.1.3 Status Messages – User Not Informed of Additional Content
5:	#33: [A11y] 1.1.1 Non-Text Content – Buttons Do Not Have An Accessible Name

Metrics

Overview			
New issues raised today:	38	Issues closed today:	00
Issues verified as not fixed today:	00	Total number of outstanding issues:	38

Guideline	Overall Result
Text Alternatives	Fail
Time-Based Media	Fail
Adaptable	Fail
Distinguishable	Fail
Keyboard Accessible	Fail
Enough Time	N/A
Seizures	Pass
Navigable	Fail
Input Modalities	Fail
Readable	Fail
Predictable	Pass
Input Assistance	Fail
Compatible	Fail

Level A Result	Level AA Result
Fail	N/A
Fail	Fail
Fail	Fail
Fail	Fail
Fail	N/A
N/A	N/A
Pass	N/A
Fail	Fail
Fail	N/A
Fail	N/A
Pass	Pass
Fail	Pass
Fail	Fail

Report

Level	A
Test Case Set	Text Alternatives
WCAG 2.1 Criteria:	A: 1.1.1 Non-Text Content
Description:	Frames, images, multimedia, etc. are considered accessible through the use of alternative text, values, labels and titles.
Results:	<p>Outcome: Fail</p> <p>It was identified that non-decorative imagery alt text is not clear to the user and it has been suggested that alternative text is made more descriptive. It was also noted that decorative imagery contains alternative text. It is expected that images that do not convey content, are decorative, or with content that is already conveyed in text are given null alternative text (alt="") or implemented as CSS backgrounds.</p> <p>When reviewing the code behind the pages under test it was noted that several form buttons lack a label In addition to this, embedded multimedia is not identified via accessible text, it is expected that embedded multimedia is appropriately titled.</p> <p>Adjacent images and text links are combined on all of the tested pages. The automated accessibility site crawl did identify an issue on the 'Archive of Annual Reports', where using the same alt text on adjacent images results in screen readers stuttering as the same text is read out twice.</p> <p>Issue identified whilst using an automated accessibility site crawl - http://itspublicknowledge.info/home/SICReports/OtherReports/PublicAwarenessResearch2009.aspx line 294</p> <p>PDF documents correctly contain alt entries for images.</p>
Issues:	#3, #8, #11, #20, #31, #32, #33, #34

Level	A & AA
Test Case Set	Time-Based Media
WCAG 2.1 Criteria:	A: 1.2.1 Pre-Recorded Audio-Only and Video-Only A: 1.2.2 Captions (Pre-Recorded) A: 1.2.3 Audio Description or Media Alternative (Pre-Recorded) AA: 1.2.4 Captions (Live) AA: 1.2.5 Audio Description (Pre-Recorded)
Description:	Video and audio elements are accessible and alternative audio and/or visual aids have been provided.
Results:	<p data-bbox="443 555 619 589">Outcome: Fail</p> <p data-bbox="443 636 1477 801">No pre-recorded audio only content is present on any of the pages under test and all pre-recorded videos all have a soundtrack. It was however observed that the 'FOI in action' video on the 'Voluntary Sector Resources' page does not have synchronised captions. Additionally, when viewing the homepage, an audio description for the video is not present, this issue was also observed on the 'Voluntary Sector Resources' page.</p> <p data-bbox="443 837 1449 904">The BSL videos on the 'What are my Rights?' page were observed to be accessibility friendly and contain an audio description, descriptive text and sign language.</p> <p data-bbox="443 940 1477 1037">Voluntary Sector Resources - FOI in action video does not contain an alternative audio track. The same video that is present on the 'Homepage' and 'What are my Rights?' Pages do not provide an audio description of the text that is present within the video.</p>
Issues:	#18, #19

Level	A & AA
Test Case Set	Adaptable
WCAG 2.1 Criteria:	A: 1.3.1 Info and Relationships A: 1.3.2 Meaningful Sequence A: 1.3.3 Sensory Characteristics AA: 1.3.4 Orientation AA: 1.3.5 Identify Input Purpose
Description:	Markup is used semantically and promotes accessibility. Content is ordered logically with stylesheets disabled and instructional content on the page does not rely upon shape, size, visual location or sound.
Results:	<p>Outcome: Fail</p> <p>When reviewing the code behind the form fields, it was found that the ‘autocomplete’ attribute is absent. It is expected that the input fields are accurately identified with the ‘autocomplete’ attribute, allowing their purpose to be programmatically determined.</p> <p>Form input fields were found to be lacking labels on the ‘Making an Appeal’, ‘A-Z of Authorities’, ‘What are my Rights?’ and ‘Voluntary Sector Resources’ pages. It is expected that all form inputs would have an associated text label. In addition, multiple headings were found to be skipped.</p> <p>Visually grouped navigational links are not contained within a <nav> element, related form elements on the Registration page are not grouped within fieldset/legend, and page regions are not currently identified with ARIA landmarks.</p> <p>When using an automated accessibility site crawl, it was found that table headings are not clearly defined. Without ‘th’ or ‘role’, screen readers apply heuristics to decide whether a table is a layout table or data table.</p> <p>In addition, due to nested tables, meaningful sequence of content is lost because HTML tables that are used to control the visual placement of the content do not linearize correctly.</p>
Issues:	#1, #13, #16, #27, #32, #36

Level	A & AA
Test Case Set	Distinguishable
WCAG 2.1 Criteria:	A: 1.4.1 Use of Colour A: 1.4.2 Audio Control AA: 1.4.3 Contrast (Minimum) AA: 1.4.4 Resize Text AA: 1.4.5 Images of Text AA: 1.4.10 Reflow AA: 1.4.11 Non-text Contrast AA: 1.4.12 Text Spacing AA: 1.4.13 Content on Hover or Focus
Description:	<p>Information - including clickable links - are not solely conveyed by colour. Mechanisms are provided to stop, pause, mute or adjust the volume for audio that automatically plays on a page for more than 3 seconds, and contrast between elements is of an acceptable standard as defined by the W3C. Additionally, the size of the text on the page can be resized to 400% without loss of content or functionality and images of text are avoided, or accessible if necessary.</p>
Results:	<p>Outcome: Fail</p> <p>On all the pages under test it was observed that multiple UI components, graphical objects, text and links within paragraphs lack sufficient contrast against the background. This can cause users with low vision to have difficulty perceiving graphics and reading text that does not contrast with its background. Providing a relative luminance can make these items more distinguishable when the person does not see a full range of colour.</p> <p>When zooming text only to 200 percent using the browsers in-built zoom the navigation tabs render over two lines, CTAs are partially cut off and copy overlaps CTAs or renders over two lines. It is expected that except for captions and images of text, text can be resized without assistive technology up to 200 percent without loss of content or functionality.</p> <p>Additional content that appeared on hover was unable to be dismissed on both the Statistics Portal and What are my Rights? pages. It is expected that the user is able to dismiss content without moving pointer hover or keyboard focus.</p> <p>When custom CSS styling is applied, it was noted that the 'Logoff' CTA is no longer observed on the Decisions Database and What are my Rights? pages. It is expected that text is displayed without loss of functionality or content.</p> <p>It was identified that several instances of images of text without the appropriate alternative text were present on the Homepage, Freedom of Information (FOI): at a Glance, Voluntary Sector Resources and Guide to Information Available Through the Commissioner's Publication Scheme pages. It is expected that if images of text are present, that they contain the appropriate alternative text, or with content that is already conveyed in text are given null alternative text (alt="") or implemented as CSS backgrounds.</p>
Issues:	#4, #5, #6, #7, #8, #10, #12, #14, #15, #21

Level	A
Test Case Set	Keyboard Accessible
WCAG 2.1 Criteria:	A: 2.1.1 Keyboard A: 2.1.2 No Keyboard Trap A: 2.1.4 Character Key Shortcuts
Description:	The website is accessible as a keyboard-only user, not requiring the use of a mouse unless the functionality cannot be accomplished in any known way using only the keyboard (e.g. freehand drawing). Shortcut and accesskeys do not conflict with existing browser and screen reader shortcuts and focus is never locked or trapped at one particular element on navigating the website using the keyboard.
Results:	<p>Outcome: Fail</p> <p>When viewing the code behind the pages under test 5 accesskeys are present. It is expected that accesskeys do not conflict with existing browser and screen reader shortcuts and should be typically avoided.</p> <p>All page elements can be tabbed to with the exception of the date picker on the Making an Appeal pages, the date picker is expanded but the user is unable to tab to it. It is expected that all page functionality is available using the keyboard, unless the functionality cannot be accomplished in any known way using only the keyboard.</p> <p>When tabbing through the tested pages, it was noted that the user does not become trapped, and the website does not require specific timings for individual keystrokes.</p>
Issues:	#22, #24

Level	A
Test Case Set	Enough Time
WCAG 2.1 Criteria:	A: 2.2.1 Timing Adjustable A: 2.2.2 Pause, Stop, Hide
Description:	If a page or application has a time limit, the user is given options to turn off, adjust, or extend that time limit. Furthermore, the user has control over automatically moving, blinking, scrolling or updating content on the page.
Results:	<p>Outcome: N/A</p> <p>No time limits are present on any of the pages under test, and no automatically moving, blinking, scrolling or updating content has been observed.</p>
Issues:	N/A

Level	A
Test Case Set	Seizures
WCAG 2.1 Criteria:	A: 2.3.1 Three Flashes or Below Threshold
Description:	Flashes do not occur more than 3 times per second, unless that flashing content is sufficiently small and the flashes are of a low contrast and do not contain too much red.
Results:	Outcome: N/A
	No flashing content has been encountered on any of the pages under test.
Issues:	N/A

Level	A & AA
Test Case Set	Navigable
WCAG 2.1 Criteria:	<p>A: 2.4.1 Bypass Blocks</p> <p>A: 2.4.2 Page Titled</p> <p>A: 2.4.3 Focus Order</p> <p>A: 2.4.4 Link Purpose (In Context)</p> <p>AA: 2.4.5 Multiple Ways</p> <p>AA: 2.4.6 Headings and Labels</p> <p>AA: 2.4.7 Focus Visible</p>
Description:	The user is able to skip repeated elements on the page through the use of a CTA or appropriately structured heading hierarchy. Titles are used where appropriate and the purpose of links, buttons and map hotspots can be determined and are readily distinguishable. More than one way is available to locate a webpage within a set of pages (except where the webpage is a result of, or a step in a process).
Results:	<p>Outcome: Fail</p> <p>A 'Page Content' CTA is present, however, it is noted that it does not currently function as expected. It is expected that upon selection, the user is provided with a means to skip navigational links that are common to all pages.</p> <p>When reviewing the code behind the tested pages, multiple headings are not present across multiple pages. Skipped or missing heading levels can result in screen reader users missing content.</p> <p>It has been observed that when tabbing through the majority of pages, the tab order is not logical. The user is tabbed from the 'Go' search CTA backwards to the 'Print Page' CTA. In addition, on all pages with the 'Text Size' element, the user is tabbed to the 'Print Page' CTA prior to the 'Text Size' Up and Down CTAs. It is also noted that the user is tabbed to the cookie notice last. It is expected that the user is tabbed to the cookie notice first. It is expected that the navigation order of the page is logical and consistent.</p> <p>A visible focus indicator is not present to highlight the element in focus when tabbing through the pages under test. A visible focus indicator can help anyone who relies on the keyboard to operate the pages, by letting them visually determine the component on which keyboard interactions will interact at any point in time.</p> <p>When using an automated accessibility site crawl, it was found that no title attribute was present for the frames on 26 pages. In addition, some pages have the same title, so the title cannot be used to distinguish between the pages.</p> <p>The purpose of each link, form image button and map hotspot can be determined, there are no multiple instances of identical or similar link text (such as 'click here' or 'read more'), headings and labels describe the topic or purpose, and more than one way is present to get to a page. The site encompasses a sitemap and search functionality.</p>
Issues:	#2, #9, #13, #17, #29, #30

Level	A
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Test Case Set	Input Modalities
WCAG 2.1 Criteria:	A: 2.5.1 Pointer Gestures A: 2.5.2 Pointer Cancellation A: 2.5.3 Label in Name A: 2.5.4 Motion Actuation
Description:	<p>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.</p> <p>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).</p>
Results:	<p>Outcome: Fail</p> <p>When reviewing the pages under test, it was observed that no functions are operable by motion, and all interactions can be completed and cancelled through simple gestures.</p> <p>Form buttons such as 'Save & Exit', 'Previous', 'Next' and 'Add File' within the Making an Appeal pages are not labelled. It is expected that form buttons would have a label to allow text-to-speech users to have a better experience because the labels that they hear will match the visible text labels that they see on the screen.</p>
Issues:	#33

Level	A & AA
Test Case Set	Readable
WCAG 2.1 Criteria:	A: 3.1.1 Language of Page AA: 3.1.2 Language of Parts
Description:	The language of the page or each passage or phrase in the content can be programmatically determined.
Results:	<p>Outcome: Fail</p> <p>When reviewing the code behind the pages under test, the language is correctly defined as lang=""en"" on all pages apart from the 'Statistics Portal' page where the language is currently absent.</p>
Issues:	#37

Level	A & AA
Test Case Set	Predictable
WCAG 2.1 Criteria:	A: 3.2.1 On Focus A: 3.2.2 On Input AA: 3.2.3 Consistent Navigation AA: 3.2.4 Consistent Identification
Description:	Interaction with the elements on the page does not result in a change of context or substantial change to the page. Navigation is consistent throughout the website and components that have the same functionality within a set of webpages (e.g. a 'Save' button) are identified consistently.
Results:	Outcome: Pass Within the tested pages, tabbing to elements did not cause any unexpected behaviour, and controls do not cause an uninitiated change of context. Consistent navigation is present across the website and components that are repeated across multiple pages are consistently identifiable.
Issues:	N/A

Level	A & AA
Test Case Set	Input Assistance
WCAG 2.1 Criteria:	A: 3.3.1 Error Identification A: 3.3.2 Labels or Instructions AA: 3.3.3 Error Suggestion AA: 3.3.4 Error Prevention (Legal, Financial, Data)
Description:	The user is made aware of when an input has been entered incorrectly or left. blank, and the user is able to reverse, check or confirm in a process that causes a legal or financial commitment.
Results:	Outcome: Fail It was observed that specific format fields provide the information that is required within the associated text, a text description is provided when an input has been entered incorrectly to the form fields, along with suggestions for input errors, and the mandatory fields are marked with an asterisk. However, a suggestion has been raised as the mandatory fields are not highlighted when an error is present within the form. This can lead to confusion for users as the field in error is not clearly identified. None of the tested pages have legal or financial implications.
Issues:	#23

Level	A & AA
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Test Case Set	Compatible
WCAG 2.1 Criteria:	A: 4.1.1 Parsing A: 4.1.2 Name, Role, Value AA: 4.1.3 Status Messages
Description:	The code behind the page does not produce any errors when run against the W3C validator, and markup is written in a way that facilitates accessibility.
Results:	<p>Outcome: Fail</p> <p>When reviewing the code behind the pages under test, multiple validation errors are observed, for example, missing start tags and duplicate attributes.</p> <p>The page language is defined correctly on all pages apart from the 'Statistics Portal' page where the language is currently absent.</p> <p>Form buttons currently lack labels and multiple headings are observed to be absent across multiple pages. It is also noted that some non-decorative imagery lacks appropriate alternative text.</p> <p>Status messages such as the pop-ups on the Making an Appeal page and the 'Response Calculator' returned results on the Voluntary Sector Resources and What are my Rights? pages are not announced when using NVDA screen reader.</p>
Issues:	#8, #13, #28, #33, #34, #35, #37

Accessible Content Top Tips

Zoonou have conducted accessibility testing against the pages/templates as agreed; however, there may be many other pages on your website. If you're using a templated approach, these should be based on the same coding structure as those tested, but each page will have its own unique copy and content. Certain accessibility standards are based around the specific content on a page.

In which case, the way you create your content on each new page may affect the extent to which you are meeting the accessibility standards you're aiming for.

Here are our top tips to help you ensure you're generating accessible content for your website:

1	All non-decorative images, particularly any that have a functional use (e.g. a button), must have an appropriate alt attribute that describes the image and its use.
2	Images that do not convey content, are decorative, or with content that is already conveyed in text are given null alternative text or implemented as CSS backgrounds.
3	Ensure no information on the page is conveyed solely by colour.
4	The user should be able to control (pause, stop, hide, etc.) any moving content on the page that persists for longer than 5 seconds.
5	Ensure no page content flashes more than 3 times per second, unless the content is sufficiently small and the flashes are of a low contrast and do not contain too much red.
6	Keep visual and auditory impairments in mind when it comes to video and audio content and provide appropriate alternate media.
7	Ensure the page can be resized to 200% using the browser's in-built zoom functionality and no loss of functionality or content occurs.
8	Instructions on the page should not rely on shape, size or visual location (e.g. 'Click the square icon to continue').
9	Define differing languages on the page appropriately in the HTML.
10	Form inputs should have associated text labels or, if labels cannot be used, a descriptive title attribute.

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