Ireland's Monitoring Report for the EU Web Accessibility Directive – 2022 Monitoring Period

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Centre for Excellence in Universal Design

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Executive Summary

"Directive (EU) 2016/2102 of the European Parliament and of the Council of 26 October 2016 on the accessibility of the websites and mobile applications of public sector bodies" (the Directive) requires Member States to ensure that websites and mobile applications (apps) of public sector bodies are fully accessible to persons with disabilities.[1]

The National Disability Authority (NDA) is named as the National Monitoring Body in the 2020 Regulations. This report covers the 2022 monitoring period. NDA is required under the Directive's Implementing Decision 2018/1524 to provide monitoring data in a national report to the European Commission every three years.[2] The next national monitoring report is due in December 2024. The monitoring results contained in the current report will form part of the next three-year national monitoring report.

NDA conducted 230 Simplified Reviews, 21 In-depth reviews on websites and 10 mobile app reviews for the 2022 monitoring period. Comparative data for specific groupings of public bodies monitored including the higher education, Local Authority and transport sectors is presented in the section on Simplified Reviews. This report also analyses the accessibility of PDFs published by government departments on gov.ie, the central portal for government services and information. The ten most frequently accessed PDFs for seventeen government departments were analysed and the results compared across each department.

During the 2022 monitoring period, NDA commenced monitoring secure transactional government service websites, namely the myAccount and ROS sites of the Revenue Commissioners. This required the cooperation of the Revenue Commissioners to facilitate secure access to these sites for the purposes of conducting the In-depth Review. NDA wishes to thank the Revenue for their cooperation and assistance.

Main findings

Overall, the current monitoring report shows little progress by the majority of public bodies for whom monitoring data is available for both the 2021 and 2022 monitoring periods.[3] This may be accounted for in part by the short timeframe between the collection and reporting of data for both monitoring periods.[4] Larger websites such as HSE.ie and GOV.ie have significantly reduced the number of errors on their websites and are actively working on addressing outstanding issues. A small number of Local

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[1] https://nda.ie/publications/communications/eu-web-accessibility-directive/

[2] https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018D1524&rid=1

[3] Forty per cent of sites subject to Simplified review in 2021 were again reviewed in 2022. 25% of websites subject to In-depth review in 2021 were again reviewed in 2022.

[4] Simplified and In-depth Review data collected for the 2021 monitoring period was gathered from October 2021 to October 2022, with the report published in December 2022. Data gathered for the 2022 monitoring period was mostly gathered from October 2022 to March 2023.

Authority websites significantly reduced the number of errors on their websites in 2022, but overall the performance of the majority of Local Authority websites remains static.

Overall, the WCAG 2.1 Success Criterion with the largest number of errors detected for the 2022 monitoring period are consistent with those reported in the 2021 monitoring report, namely: colour contrast, PDF inaccessibility, "Information and Relationships" and "Name, Role, Value".

Insufficient colour contrast errors accounted for the highest number of errors on 100 sites subject to Simplified Review (n=230) and the highest total number of errors across all sites subject to In-depth Review (1,117 errors, 34%). A number of public bodies reported anecdotally to NDA that the colour palette used on their website is based on their corporate branding guidelines which was not optimised for web use.

> NDA recommends that public bodies review the branding and choice of colours used on their websites and optimise these for viewing on the web.

PDF errors accounted for the highest total number of errors for 68 sites subject to Simplified Review. In total, 8,404 errors were detected for the 170 PDFs of government departments.

Many of the PDFs reviewed contain small amounts of content (1-2 pages) and these are better suited for publishing in accessible HTML or Word. Many of the larger PDF reports analysed were not designed with accessibility in mind and the accessibility checkers and features available in MS Word, Adobe InDesign and Acrobat Pro were not used. Application forms in inaccessible PDF have a critical impact on some users' ability to use a service online and should be prioritised for remediation.

> NDA recommends that public bodies consider the most accessible format in which to publish content. This may require consultation with customers with disabilities or Disabled Persons Organisations. While public bodies should aim for full compliance with the standard EN 301 549 for all content published online, public bodies should also consider the provision of content in a variety of alternate formats on request.[5]

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[5] See for example CEUD's Customer Communications Toolkit for Services to the Public - A Universal Design Approach and VVI's Manual on Accessible Communications

> NDA recommends that accessibility is considered at the earliest stage of content creation. The accessibility features and checkers in office application software such as MS Word and Adobe Acrobat Pro should be used. Where content and PDFs are generated external to the organisation, a clear set of accessibility requirements for PDFs should be provided to the content creator or print design company.

> NDA recommends that PDF forms should be avoided for all online services and accessible HTML used instead. This may require the use of specialist development skills.

Interactive elements on public sector websites include application forms, search forms and widgets such as cookie banners. The "Name, role value" WCAG 2.1 Success Criteria (SC) 4.1.2 is an indicator of whether these elements are accessible. Errors related to this SC accounted for the highest total of errors on 19 sites subject to Simplified Review (n=230) and the second largest total number of errors across all sites subject to In-depth Review (335 errors, 11%).

> NDA recommends that all interactive elements, including forms and widgets are designed and implemented to be accessible. Specialised supports from accessibility experts may be required to ensure forms and online services are accessible from start to finish.

A majority of websites and mobile apps monitored did not contain an Accessibility Statement in line with the requirements of the Directive.[6] An Accessibility Statement is required information containing a declaration of the website or app's compliance with the standard, information on how a persons may provide feedback or make a complaint.

> NDA recommends all public bodies publish and maintain an accurate and up to date Accessibility Statement on each of their websites and mobile apps.

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[6] See NDA guidance on Accessibility Statements

Managing accessibility

NDA provided all public bodies subject to monitoring for 2022 and who have responded to NDA's Notice of Monitoring in this regard, with all monitoring data for the website or mobile app reviewed.

For public bodies subject to Simplified Review, the automated data provided covers a maximum of 57% of WCAG 2.1 Success Criteria. Public bodies should not equate the results of automated results with compliance. Simplified Reviews cannot confirm compliance with EN 301 549/WCAG 2.1 AA, as required under the Directive. Public bodies are required to publish and maintain an Accessibility Statement that contains information such as a declaration of the website's/mobile apps' compliance with EN 301 549/WCAG 2.1AA.

Public bodies should not equate the results of automated results with compliance. NDA recommends that public bodies view their Simplified Review results as the first step in improving compliance. In order to confirm compliance, public bodies should conduct or commission their own review to confirm their level of compliance and make an accurate declaration of compliance as part of their Accessibility Statement.

1. In-depth Reviews

This report contains monitoring data on the 230 Simplified, 21 In-depth and 10 mobile app reviews conducted by NDA for the 2022 monitoring period under the EU Web Accessibility Directive. Ireland's monitoring reports for the period 2018-2021 are available on the NDA's website.[7]

Implementing Decision 2018/1524 requires the National Monitoring Body to maintain a Register of websites and mobile apps for review in the current monitoring period. The selection of the sample for review should include websites representing as much as possible the variety of services provided by the public sector bodies. This includes "social protection, health, transport, education, employment and taxes, environmental protection, recreation and culture, housing and community amenities and public order and safety." NDA chose the websites and mobile apps for review based on a survey circulated in August 2021 and ongoing consultation with stakeholders and disabled persons organisations through, for example, the network of departmental Disability Consultative Committees.

In-depth and Mobile App Review methodology

The In-depth and Mobile App review methodology as detailed in the 2021 monitoring report remained consistent for the 2022 monitoring period. Websites and mobile apps were chosen and their pages sampled in accordance with Implementing Decision 2018/1524.[8] Testing utilised automated and manual inspection for WCAG 2.1 Success Criteria, including using axe Auditor, NVDA and Chrome (websites only) and automated inspection using the axe-core ruleset, axe Monitor and axe-pdf Engine. Testing of mobile apps included use of the TalkBack (Android) and VoiceOver (iOS) screen readers.

Table 1.1 shows the percentage of issues identified across all WCAG 2.1 AA Success Criteria. The three most common issues for websites are colour contrast, Information and relationships and Name, role value. Examples of each these issues for the in-depth review include:

- WCAG 2.1 Success Criteria: 1.4.1 Use of Color. Level AA
  - Text and images of text do not have a contrast ratio of at least 4.5:1.
  - Large text, with at least 18 point (typically 24px) does not have a contrast ratio of at least 3:1.
- WCAG 2.1 Success Criteria: 1.3.1 Information and Relationships. Level A
  - Semantic mark-upmark-up not used properly to designate headings (<h1>), regions/landmarks, lists (<ul> and <ol>).
  - Tables are used for tabular data do not contain correct mark-up, especially in PDFs
  - Text labels in forms not correctly associated with form input elements.
- WCAG 2.1 Success Criteria: 4.1.2 Name, Role, Value. Level A

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[7] https://nda.ie/publications/monitoring-report-eu-wad-ireland-2021-nda-report

[8] Implementing Decision 2018/1524

- o Mark-upMark-up is not used in a way that facilitates accessibility. This includes following the HTML specifications and using forms, form labels, frame titles, etc. appropriately.
- o ARIA not used appropriately to enhance accessibility when HTML is not sufficient.[9]

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[9] Issue descriptions based on [WebAims WCAG 2 Checklist](#)

Table 1.1: Average number of WCAG 2.1 AA issues per page

SC Description	SC Level	Issues	#errors as a % of total
1.1.1 Non-Text Content	A	127	4%
1.2.1 Audio-only and Video-only (Pre-recorded)	A	1	0%
1.2.2 Captions (Pre-recorded)	A	2	0%
1.2.3 Audio Description or Media Alternative (Pre-recorded)	A	0	0%
1.2.4 Captions (Live)	AA	0	0%
1.2.5 Audio Description (Pre-recorded)	AA	0	0%
1.3.1 Info & Relationships	A	532	16%
1.3.2 Meaningful Sequence	A	42	1%
1.3.3 Sensory Characteristics	A	5	0%
1.3.4 Orientation	AA	9	0%
1.3.5 Identify Input Purpose	AA	28	1%
1.4.1 Use of Colour	A	53	2%
1.4.10 Reflow	AA	92	3%
1.4.11 Non-Text Contrast	AA	176	5%
1.4.12 Text Spacing	AA	37	1%
1.4.13 Content on Hover or Focus	AA	17	1%
1.4.2 Audio Control	A	0	0%
1.4.3 Contrast (Minimum)	AA	1117	34%
1.4.4 Resize Text	AA	35	1%
1.4.5 Images of Text	AA	12	0%
2.1.1 Keyboard	A	75	2%
2.1.2 No Keyboard Trap	A	1	0%
2.1.4 Character Key Shortcuts	A	0	0%
2.2.1 Timing Adjustable	A	7	0%
2.2.2 Pause, Stop, Hide	A	13	0%
2.3.1 Three Flashes or Below Threshold	A	0	0%
2.4.1 Bypass Blocks	A	25	1%
2.4.2 Page Titled	A	34	1%
2.4.3 Focus Order	A	74	2%
2.4.4 Link Purpose (In Context)	A	44	1%
2.4.5 Multiple Ways	AA	3	0%
2.4.6 Headings and Labels	AA	29	1%
2.4.7 Focus Visible	AA	48	1%
2.5.1 Pointer Gestures	A	0	0%
2.5.2 Pointer Cancellation	A	0	0%
2.5.3 Label in Name	A	42	1%
2.5.4 Motion Actuation	A	0	0%
3.1.1 Language of Page	A	18	1%
3.1.2 Language of Parts	AA	31	1%
3.2.1 On Focus	A	0	0%

SC Description	SC Level	Issues	#errors as a % of total
3.2.2 On Input	A	4	0%
3.2.3 Consistent Navigation	AA	2	0%
3.2.4 Consistent Identification	AA	2	0%
3.3.1 Error Identification	A	11	0%
3.3.2 Labels or Instructions	A	9	0%
3.3.3 Error Suggestion	AA	2	0%
3.3.4 Error Prevention (Legal, Financial, Data)	AA	0	0%
4.1.1 Parsing	A	183	5%
4.1.2 Name, Role, Value	A	355	11%
4.1.3 Status Messages	AA	37	1%
Total	**50**	**3334**	**100%**

User impact

In-depth Reviews use WCAG 2.1 Success Criteria to check user impact based on four basic principles for ensuring accessibility for persons with disabilities:

1. Can all your users, with the abilities and senses that they possess, **perceive** the information your application presents to them?
2. Can your users, with their specific input device or assistive technology, **operate** all the controls within your application's user interface?
3. Can your users **understand** the information and the user interface controls?
4. Is your content **robust** enough that it can be interpreted reliably by a wide variety of user agents, including assistive technologies?

Table 1.2 provides a description of the 5 user impacts provided for In-depth Reviews below.

Table 1.2: Issues by User Impact

Impact	Impact Description
Blocker	Prevents some users with disabilities from using core content.
Critical	Prevents some users with disabilities from accessing certain parts of the content, potentially rendering it unusable.
Serious	Presents serious barriers for some users with disabilities and will partially prevent them from using portions of the content.
Moderate	Presents some barriers for users with disabilities that will reduce their overall experience with the content.
Minor	Causes some nuisance or can be annoying, but not presenting barriers for users with disabilities.

1. An Post[10]

Key findings

In total, 72 errors (72 WCAG Success Criteria (SC)) were identified across 9 pages and 3 components assessed (Figure 1.1.1). This equates to a compliance rate of 60% for the WCAG 2.1 SC tested (Figure 1.1.2).
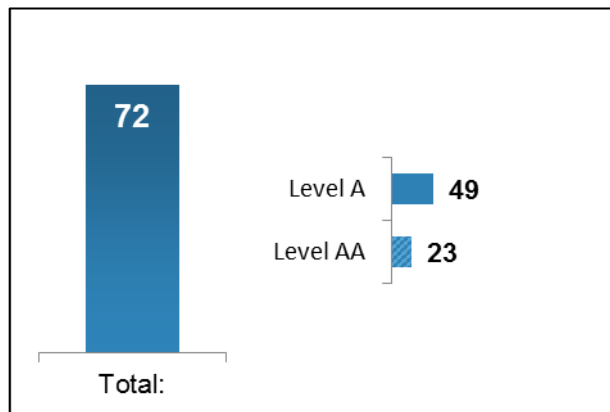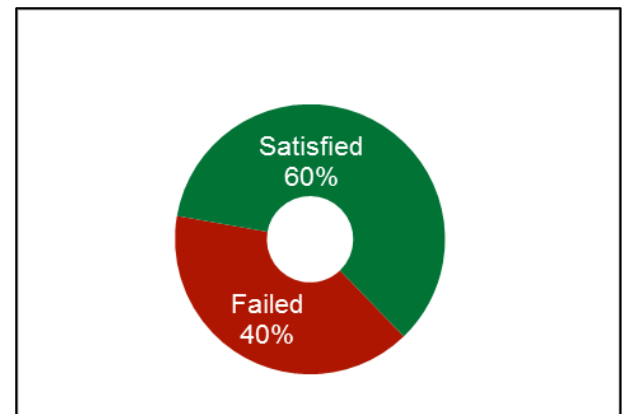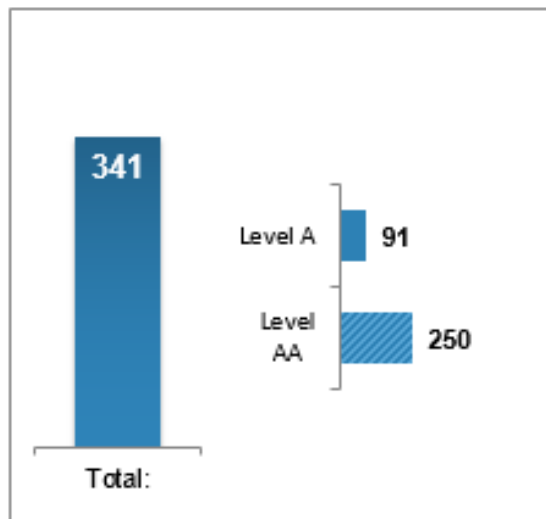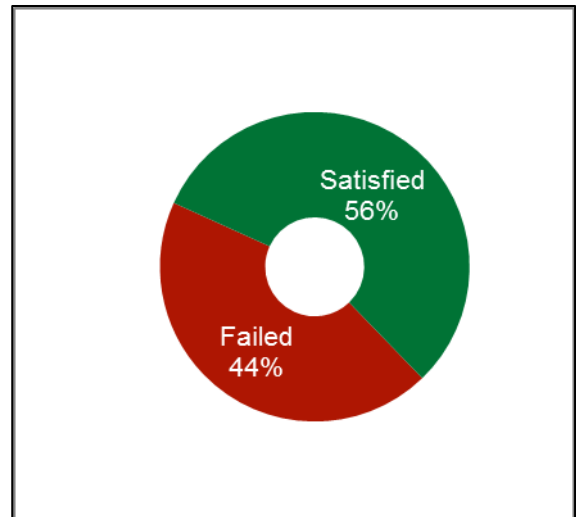

Figure 1.1.1: No of WCAG Issues

Figure 1.1.2: WCAG Compliance

User Impact

The majority of WCAG 2.1 SC failures were classified as having a "Serious" user impact (n=53), with the second highest number classified as "Critical" (n=16). No "Blocker" issues were identified (Figure 1.1.3).
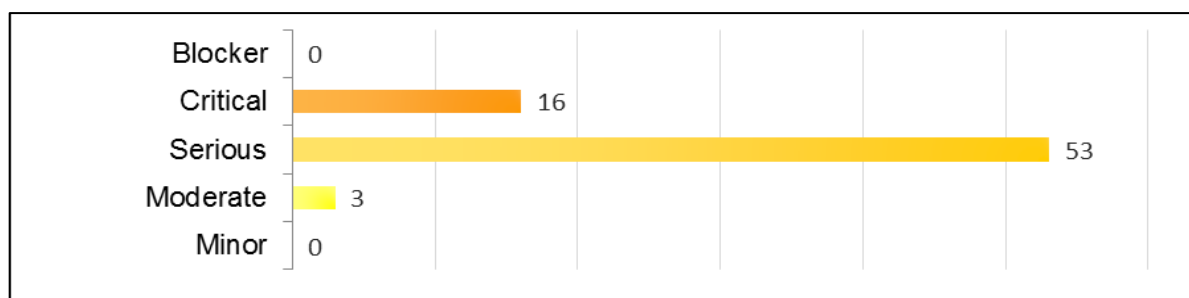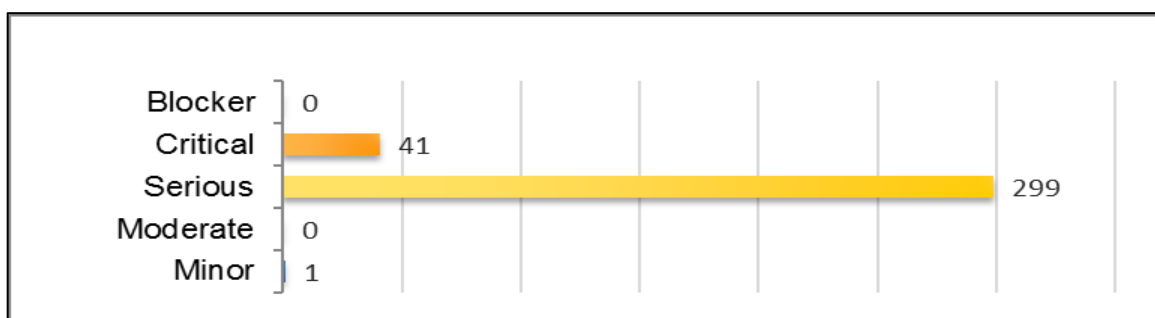

Figure 1.1.3: No. of WACG errors by User Impact

WCAG issues

Four success criteria, were related to 44.3% of all issues:

- Info and Relationships – 13.8%
- Non-Text Contrast – 12.5%
- Non-Text Content – 9.7%
- Name, Role and Value – 8.3%

The top 10 issues are listed in Figure 1.1.4.

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[10] https://www.anpost.com – national postal service of Ireland
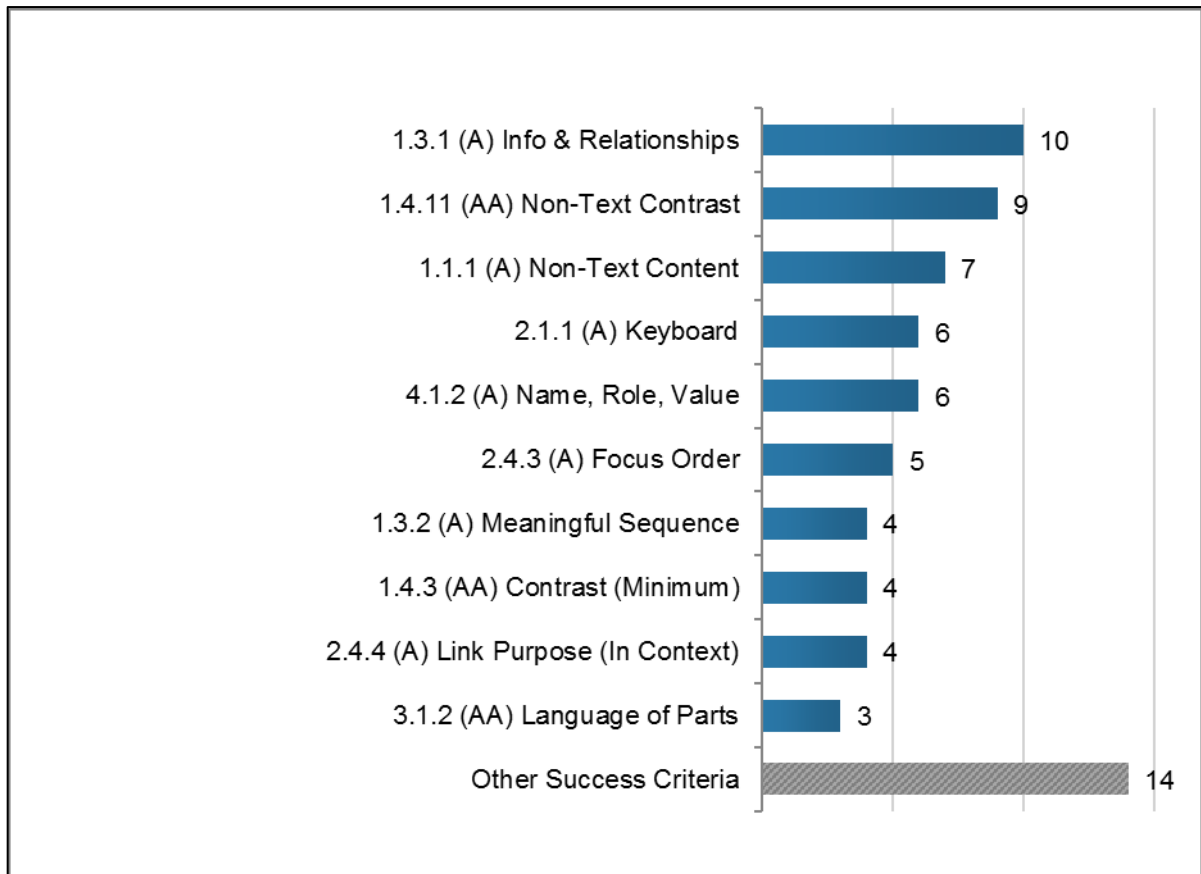
Figure 1.1.4: Top 10 WCAG Issues

Link to Accessible table

EN 301 549 issues
No EN 301 549 errors found.

2. Bus Éireann [11]

Key findings

In total, 341 errors (341 WCAG 2.1 SC and 0 EN 301 549 clauses) were identified across 14 pages and 6 components assessed (Figure 1.2.1). This equates to a compliance rate of 56% for the WCAG 2.1 SC tested (Figure 1.2.2).
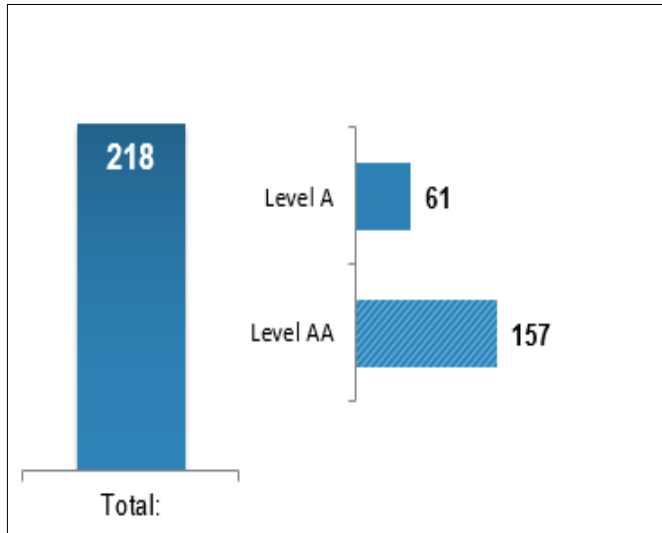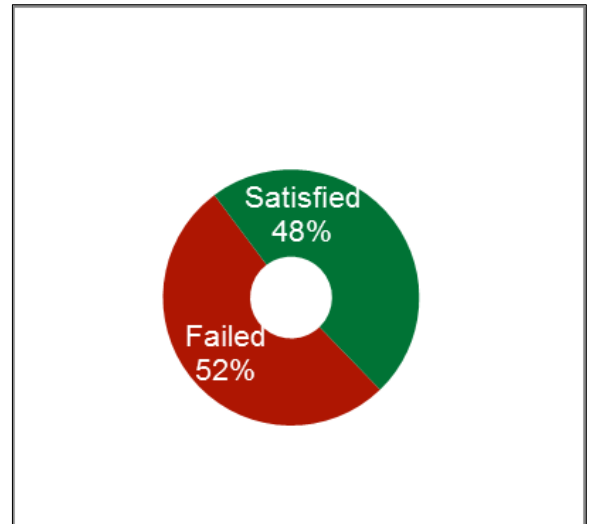

Figure 1.2.1: No of WCAG Issues

Figure 1.2.2: WCAG Compliance

User Impact

The majority of WCAG 2.1 SC failures
were classified as having a "Serious" user impact (n=299), with the second highest number classified as "Critical" (n=41). No "Blocker" issues were identified (Figure 1.2.3).
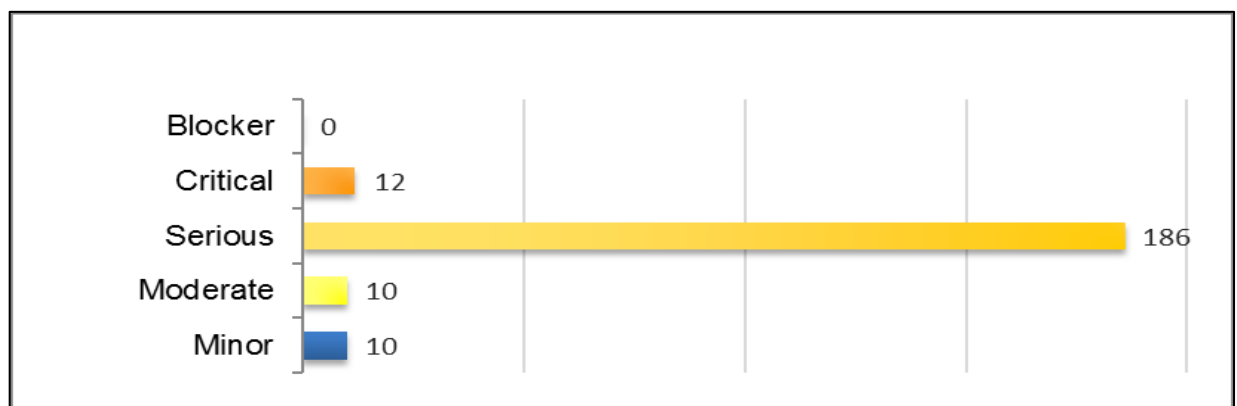

Figure 1.2.3: No. of WCAG errors by User Impact

WCAG issues

Four success criteria, were related to 85% of all issues:

- Text contrast – 68%
- Name, Role, Value – 9%

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[11] https://www.buseireann.ie - – national bus service of Ireland

- Info and Relationships – 5%
- Focus Order – 3%

The top 10 issues are listed in Figure 1.2.4.
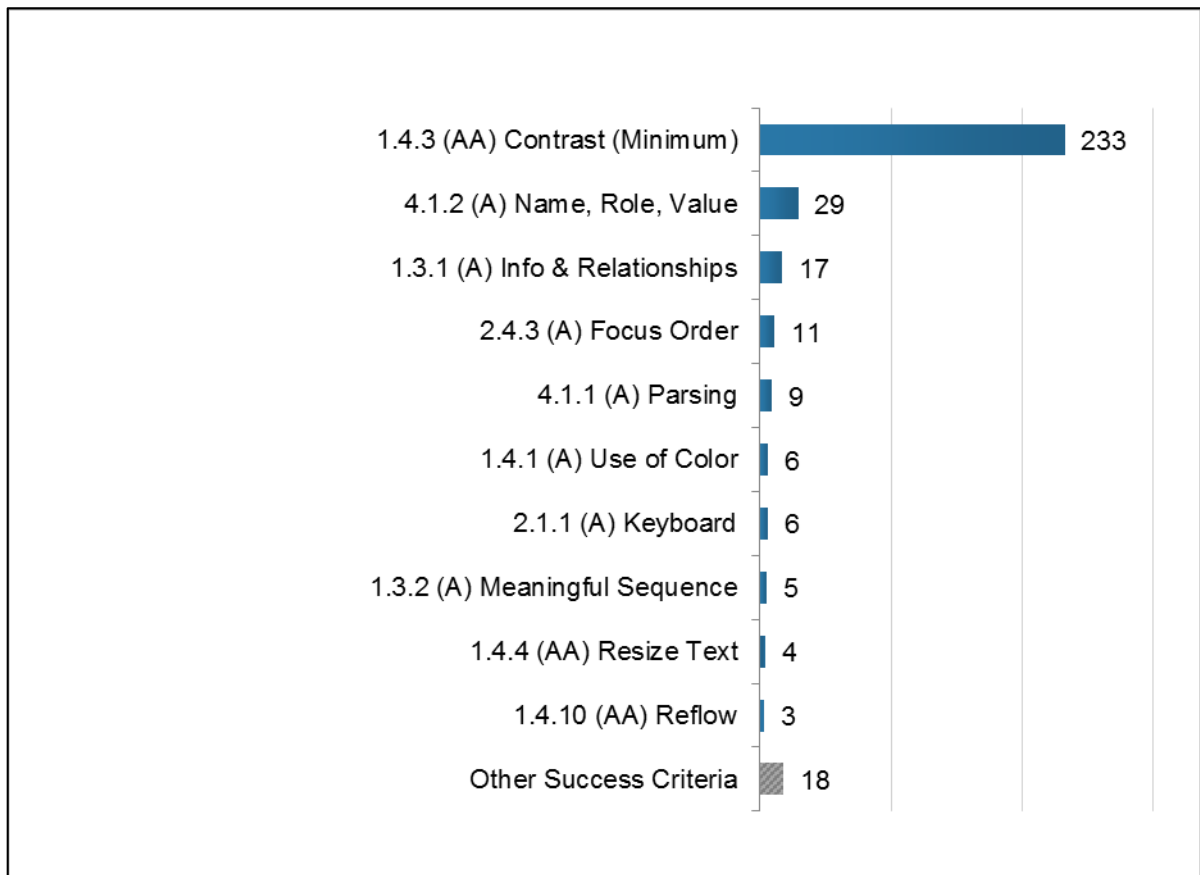
Figure 1.2.4: Top 10 WCAG Issues

[Link to accessible table](#)

EN 301 549 issues

No EN 301 549 errors found.

3. City of Dublin Education and Training Board

Key findings

In total, 218 errors (218 WCAG 2.1 SC and 0 EN 301 549 clauses) were identified across 11 pages and 5 components assessed (Figure 1.3.1). This equates to a compliance rate of 48% for the WCAG 2.1 SC tested (Figure 1.3.2).
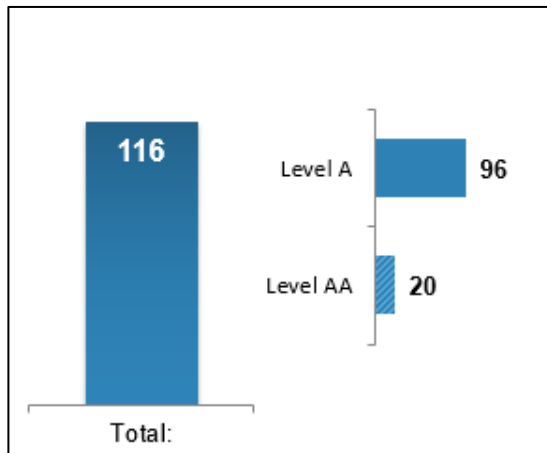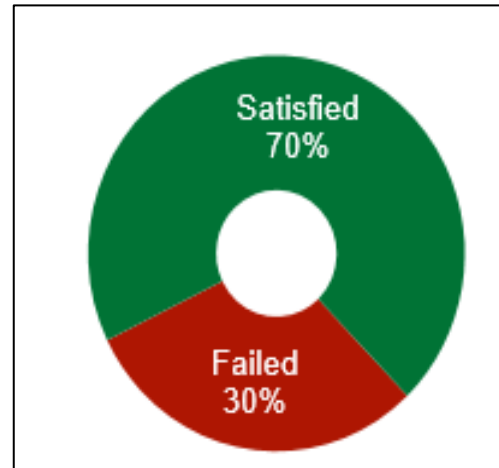

Figure 1.3.1: No. of WCAG Issues

Figure 1.3.2: WCAG Compliance

User Impact

The majority of WCAG 2.1 SC failures were classified as having a "Serious" user impact (n=186), with the second highest number classified as "Critical" (n=12). No "Blocker" issues were identified (Figure 1.3.3).
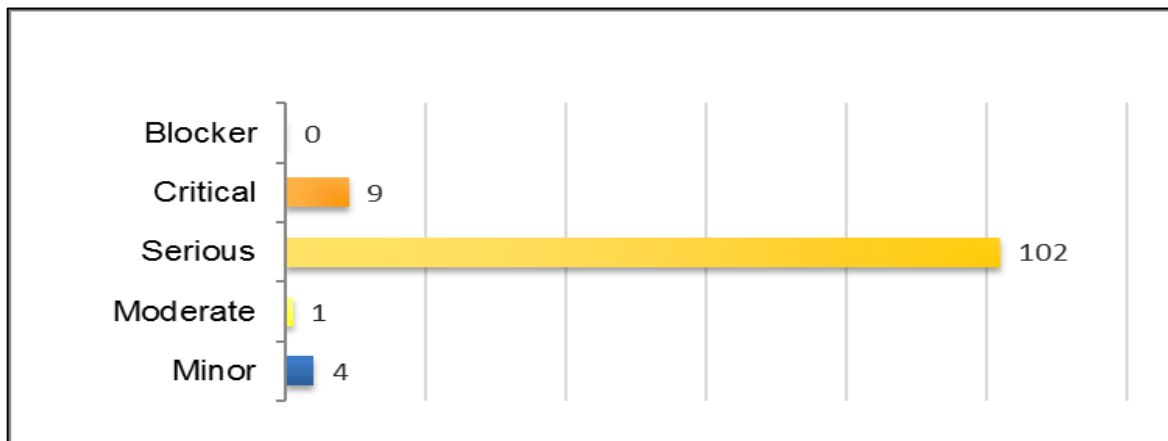

Figure 1.3.3: No. of WCAG errors by User Impact1

WCAG issues

Four success criteria, were related to 32% of all issues:

- Contrast (Minimum)– 8.5%
- Info and Relationships – 12.7%
- Parsing – 5.4%
- Non-Text Content – 5.4%

The top 10 issues are listed in Figure 1.3.4.
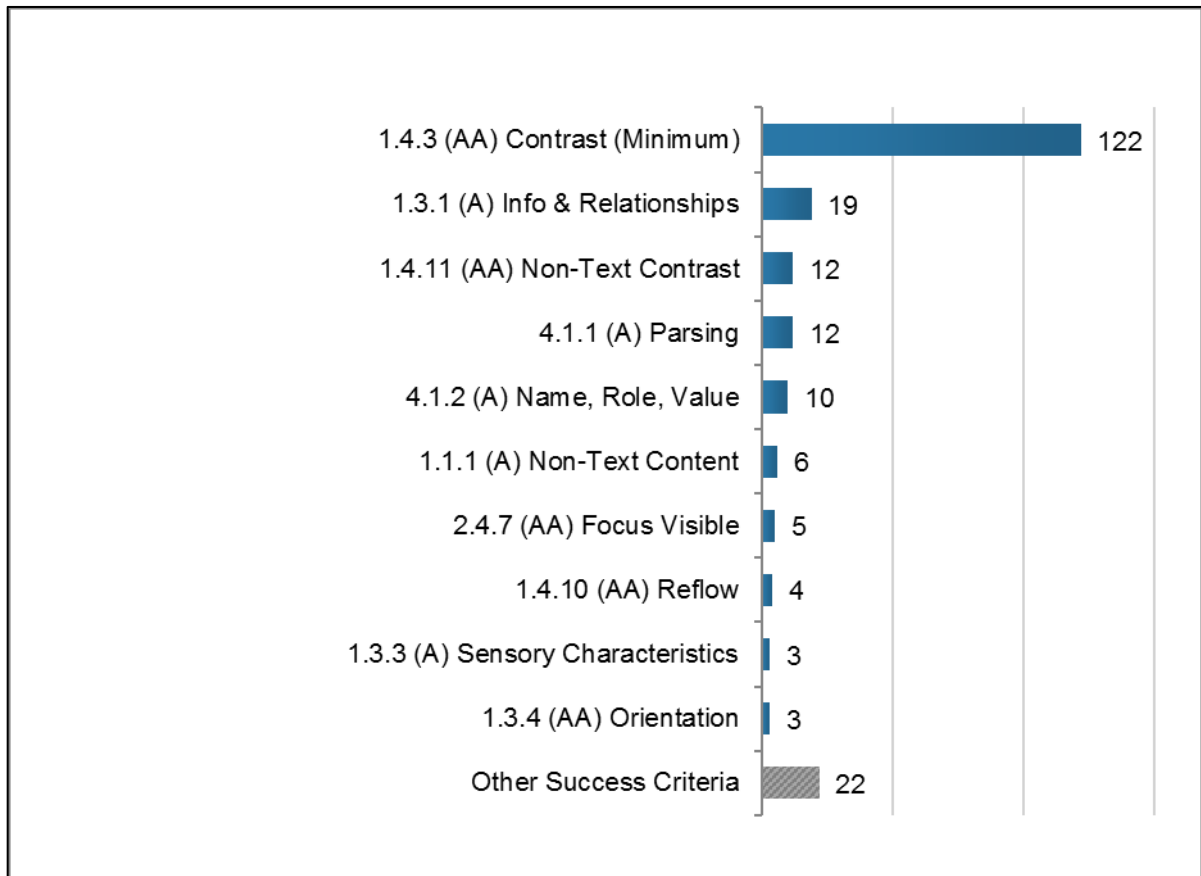
Figure 1.3.4: Top 10 WCAG Issues

[Link to accessible table](#)

EN 301 549 issues
No EN 301 549 errors found.

4. Department of Social Protection[12]

Key findings

In total, errors (116 WCAG 2.1 SC and 0 EN 301 549 clauses) were identified across 14 pages and 6 components assessed (Figure 1.4.1). This equates to a compliance rate of 70% for the WCAG 2.1 SC tested (Figure 1.4.2).

Figure 1.4.1: No. of WCAG Issues

Figure 1.4.2: WCAG Compliance

User Impact

The majority of WCAG 2.1 SC failures were classified as having a "Serious" user impact (n=102), with the second highest number classified as "Critical" (n=9). No "Blocker" issues were identified (Figure 1.4.3).

Figure 1.4.3: No of WCAG errors by User Impact

WCAG issues

Four success criteria, were related to 76% of all issues:

- Info and Relationships– 58%
- Name, Role, Value – 7%

12

- Non–text Contrast - 7%
- Use of Colour – 4%

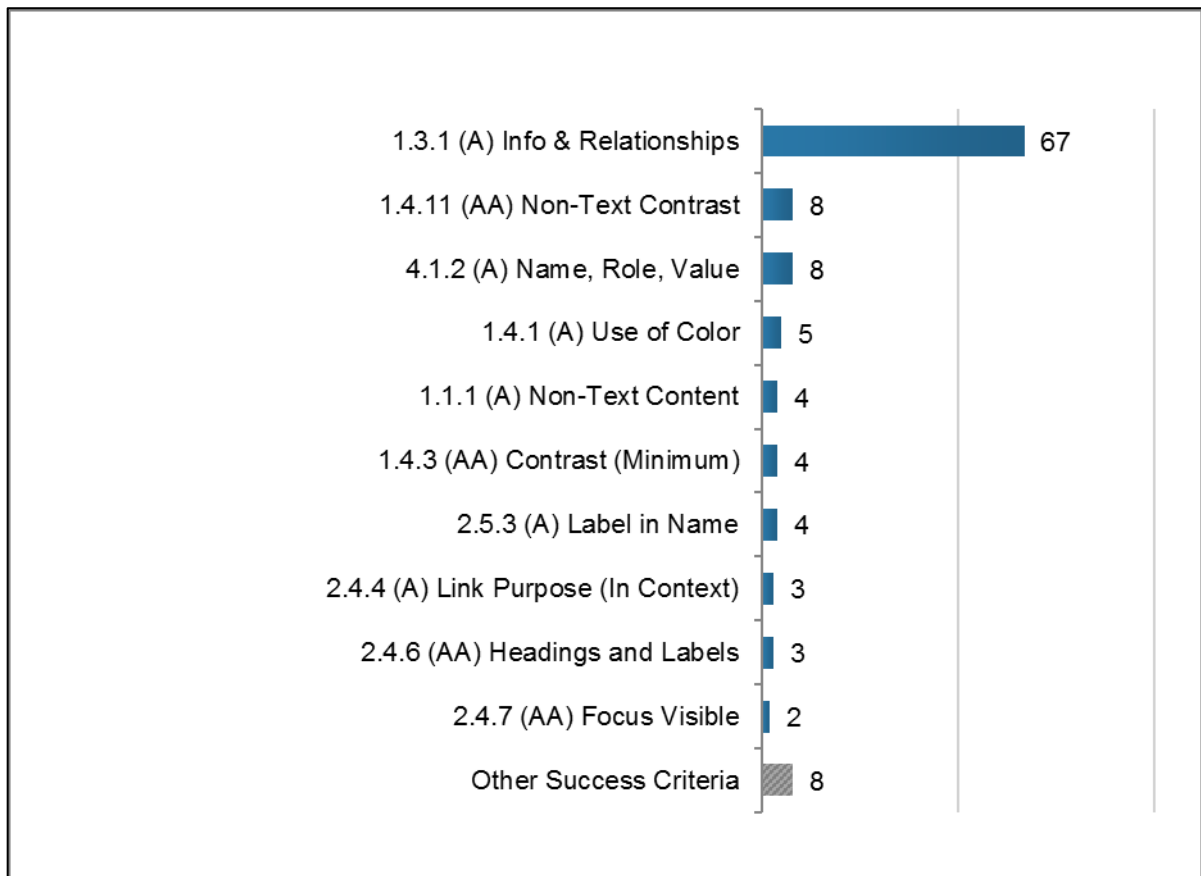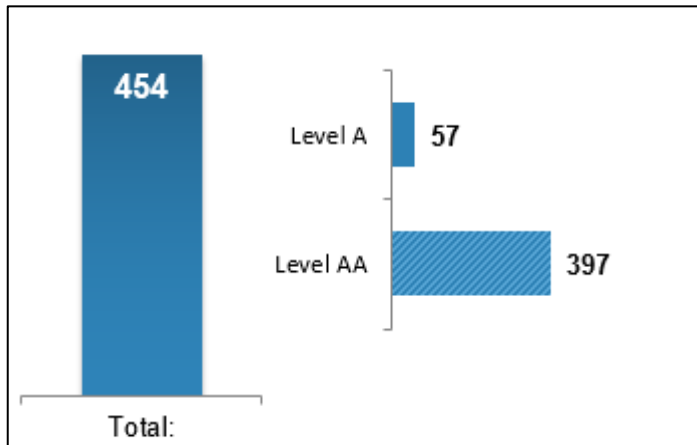The top 10 issues are listed in Figure 1.4.4 below.

Figure 1.4.4: Top 10 WCAG Issues

Link to accessible table

EN 301 549 issues
No EN 301 549 errors found.

5. Dublin City Library Catalogue[13]

Key findings

In total, 454 issues (454 WCAG and 0 additional EN 301 549-specific) were identified across 17 pages and 3 components assessed (Figure 1.5.1). This equates to a compliance rate of 56% for the WCAG 2.1 SC tested (Figure 1.5.2).
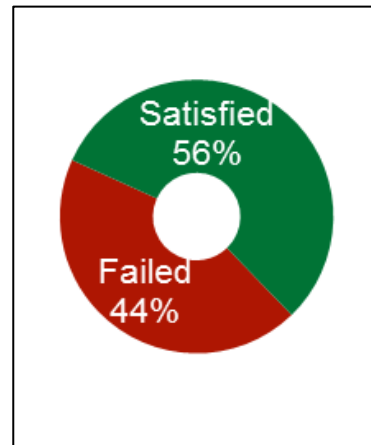

Figure 1.5.1: No. of WCAG Issues

Figure 1.5.2: WCAG Compliance

User Impact

The majority of WCAG 2.1 SC failures were classified as having a "Serious" user impact (n=442), with the second highest number classified as "Critical" (n=12). No "Blocker" issues were identified (Figure 1.5.3).
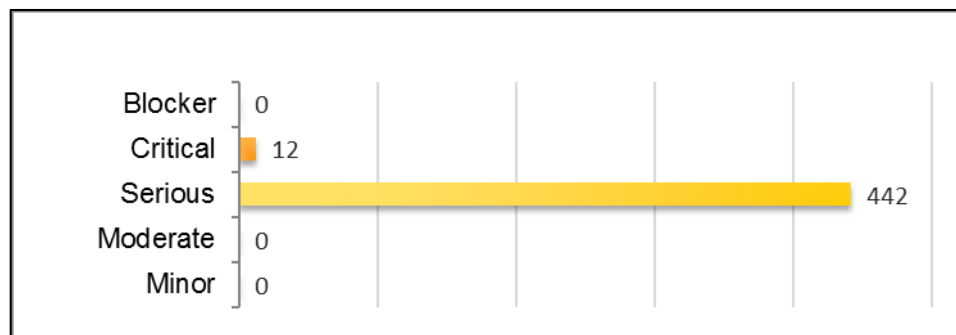

Figure 1.5.3: No of WCAG errors by User Impact

WCAG issues

One success criterion, Colour Contrast, was related to 79.3 % of all issues:
56.0% of the 50 WCAG success criteria were passed. The top 10 issues are listed in Figure 1.5.4.
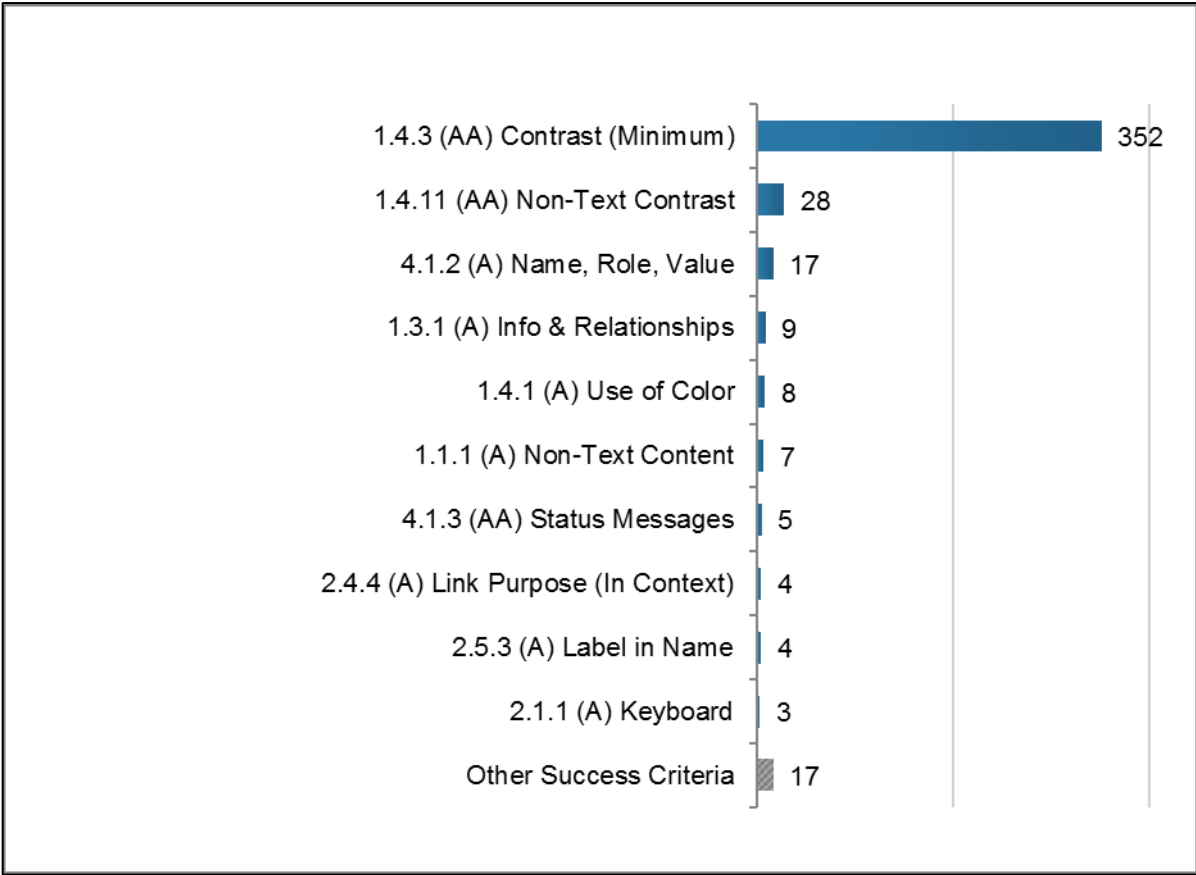

13

Figure 1.5.4: Top 10 WCAG Issues

[Link to accessible table](#)

EN 301 549 issues
No EN 301 549 errors found.

6. Galway County Council[14]

Key Findings

In total, 153 issues (151 WCAG and 2 additional EN 301 549-specific) were identified across 8 pages and 5 components assessed (Figure 1.6.1). This equates to a compliance rate of 58% for the WCAG 2.1 SC tested (Figure 1.6.2).
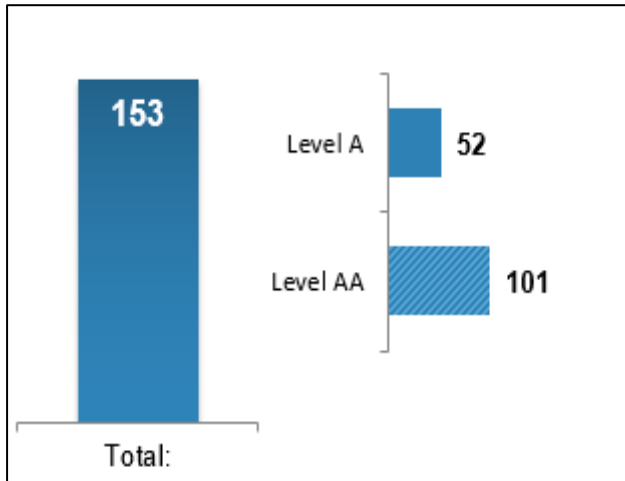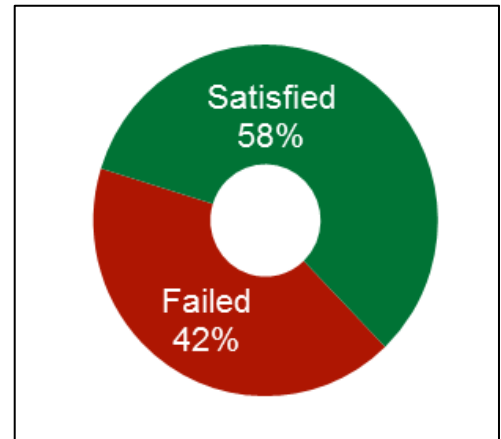

Figure 1.6.1: No. of WCAG Issues

Figure 1.6.2: WCAG Compliance

User Impact

The majority of WCAG 2.1 SC failures were classified as having a "Serious" user impact (n=134), with the second highest number classified as "Critical" (n=16). No "Blocker" issues were identified (Figure 1.6.3).
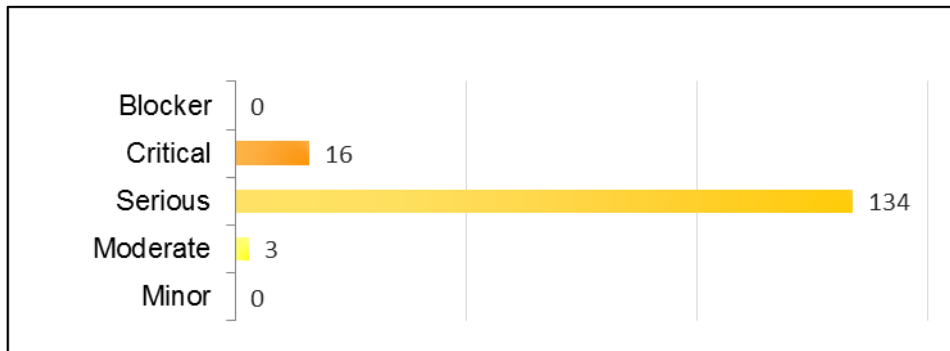

Figure 1.6.3: No of WCAG errors by User Impact

WCAG issues

Four success criteria, were related to 67.7 % of all issues:

- Colour Contrast – 49.6%
- Headings – 7.8%
- Name, Role, Value – 5.8%

14

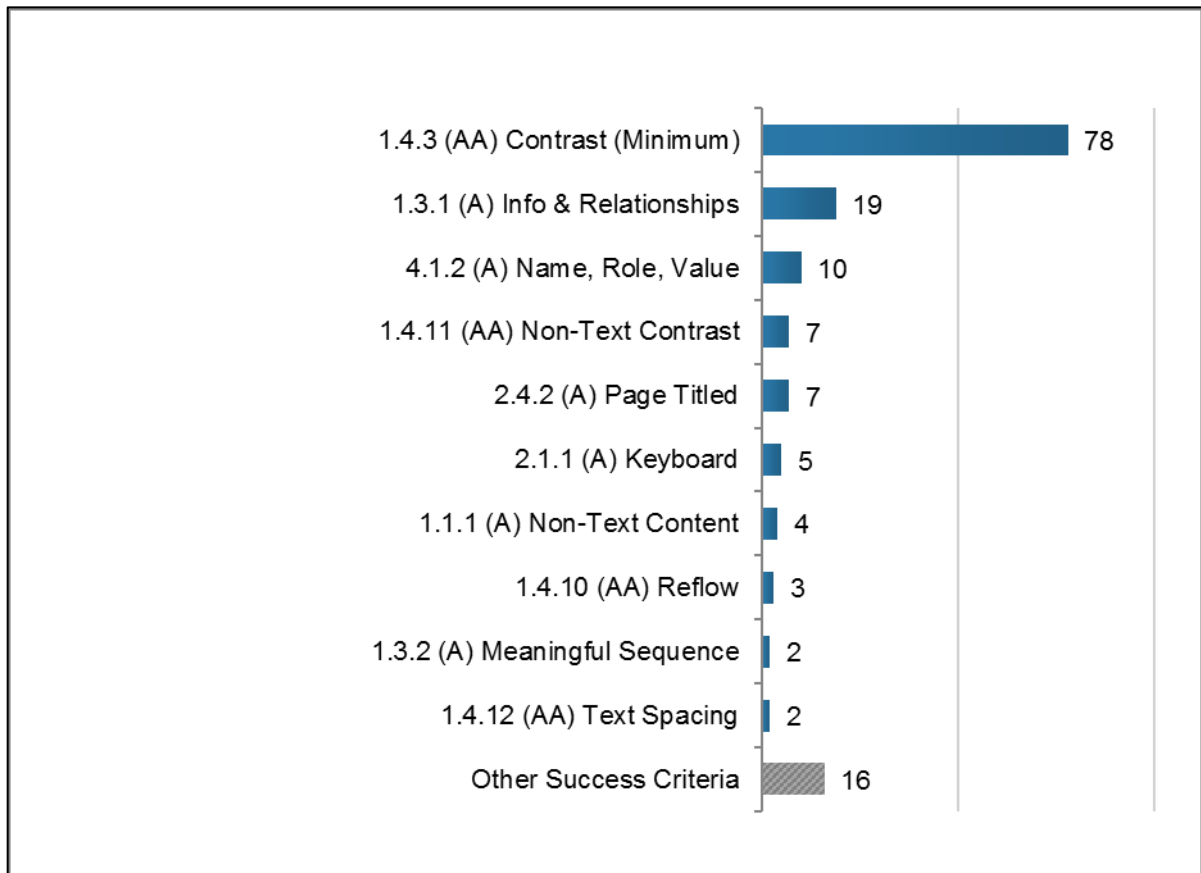- Titles on Pages – 4.5%

The top 10 issues are listed in Figure 1.6.4.

Figure 1.6.4: Top 10 WCAG Issues

[Link to accessible table](#)

EN 301 549 issues

Two EN 301 549 errors found.

7. Employability Wicklow[15]

Key Findings

In total, 121 issues (121 WCAG and 0 additional EN 301 549 specific) were identified across 12 pages and 8 components assessed (Figure 1.7.1). This equates to a compliance rate of 44% for the WCAG 2.1 SC tested (Figure 1.7.2).
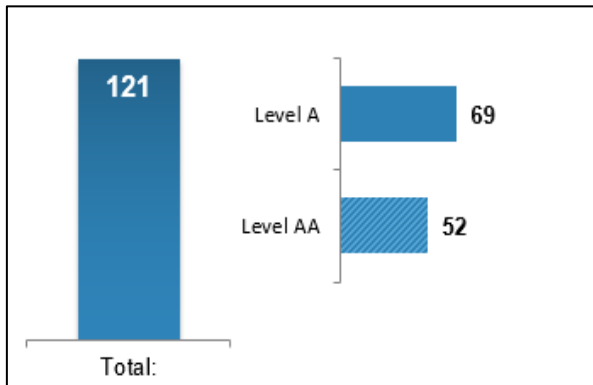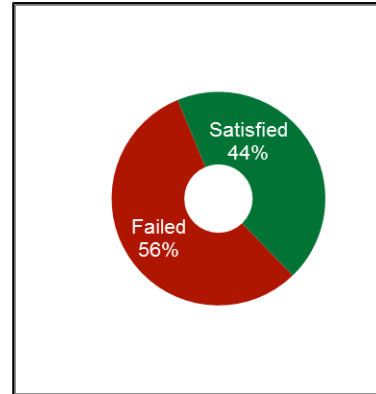

Figure 1.7.1: No. of WCAG Issues

Figure 1.7.2: WCAG Compliance

User Impact

The majority of WCAG 2.1 SC failures were classified as having a "Serious" user impact (n=92), with the second highest number classified as "Critical" (n=11). No "Blocker" issues were identified (Figure 1.7.3).

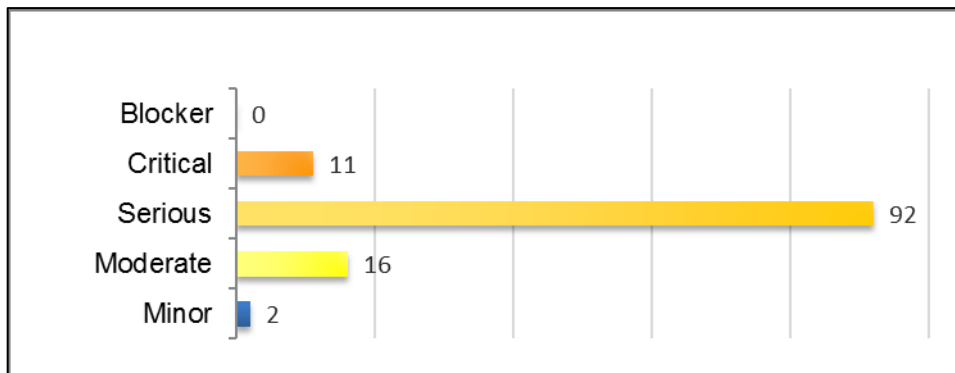Figure 1.7.3: No. of WCAG errors by User Impact

WCAG issues

Four success criteria, were related to 48.7% of all issues:

- Non-Text Content – 16.5%
- Reflow – 12.7%
- Info and Relationships – 10.5%
- Non-Text Content – 9.0%
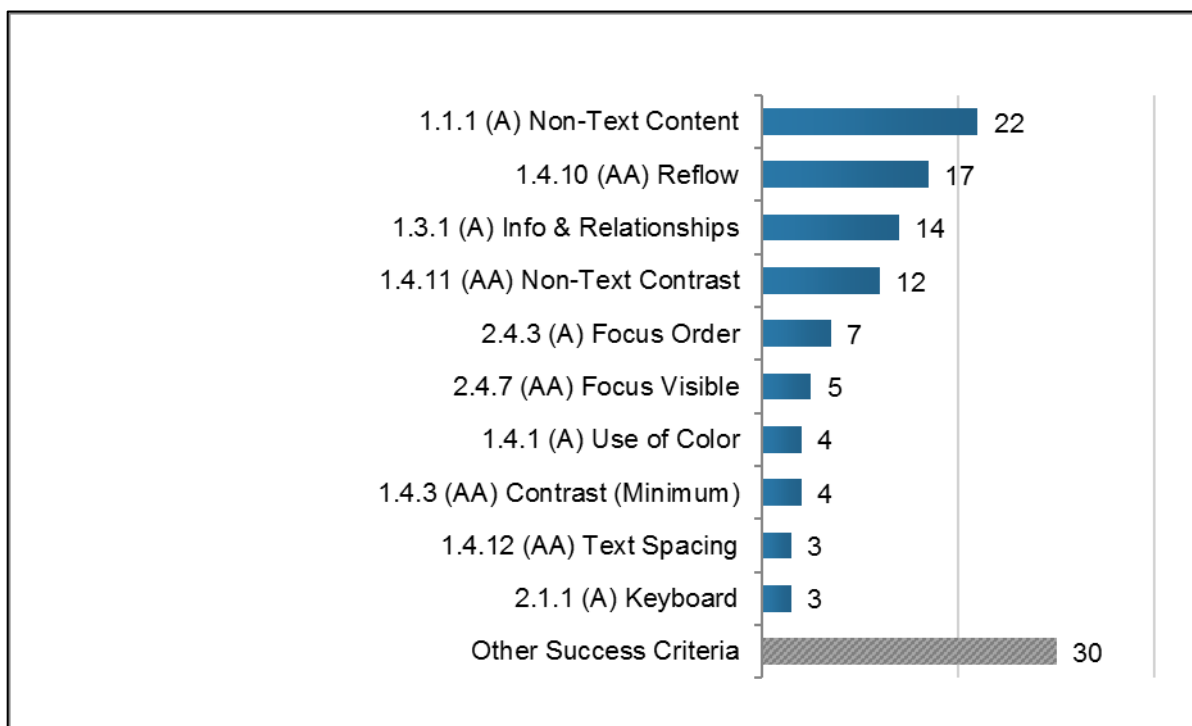
The top 10 issues are listed in Figure 1.7.4.

15

Figure 1.7.4: Top 10 WCAG Issues

[Link to accessible table](#)

EN 301 549 issues
No EN 301 549 errors found.

8. Fáilte Ireland[16]

Key Findings

In total, 25 issues (25 WCAG and 0 additional EN 301 549 specific) were identified across 6 pages and 4 components assessed (Figure 1.8.1). This equates to a compliance rate of 74% for the WCAG 2.1 SC tested (Figure 1.8.2).

Figure 1.8.1: No. of WCAG Issues

Figure 1.8.2: WCAG Compliance

User Impact

The majority of WCAG 2.1 SC failures were classified as having a "Serious" user impact (n=18), with the second highest number classified as "Critical" (n=2). No "Blocker" issues were identified (Figure 1.8.3).

Figure 1.8.3: No. of WCAG errors by User Impact

WCAG issues

Four success criteria were found to have 56% of issues:
- Non-text contrast – 20%

- Name, Role, Value– 12%
- Use of Colour – 12%
- Info and Relationships – 12%

The top 10 issues are listed in Figure 1.8.4.

Figure 1.8.4: Top 10 WCAG Issues

[Link to accessible table](#)

EN 301 549 issues
No EN 301 549 errors found.

9. Health Service Executive[17]

Key Findings

In total, 109 issues (109 WCAG and 0 additional EN 301 549 specific) were identified across 12 pages and 8 components assessed (Figure 1.9.1). This equates to a compliance rate of 52% for the WCAG 2.1 SC tested (Figure 1.9.2).
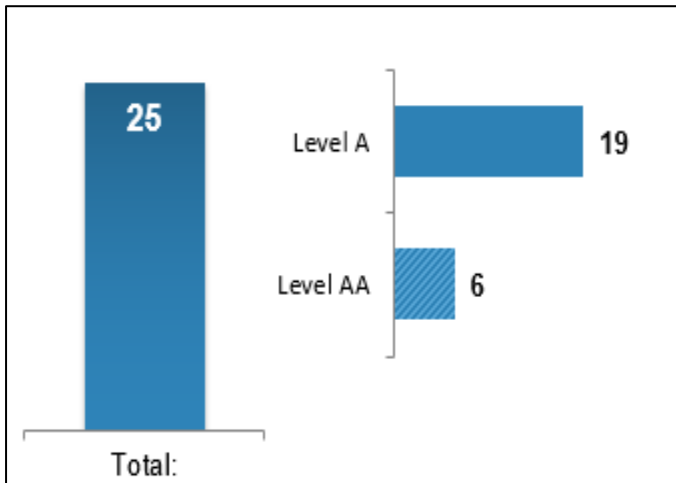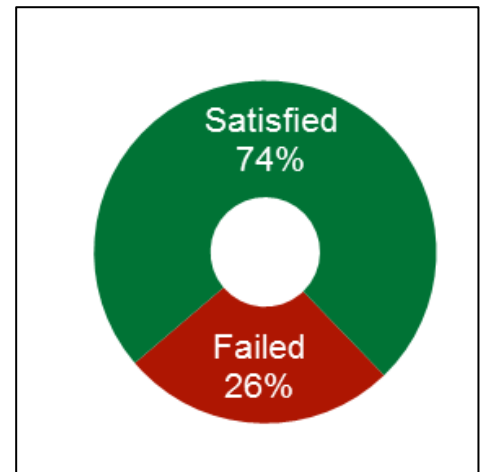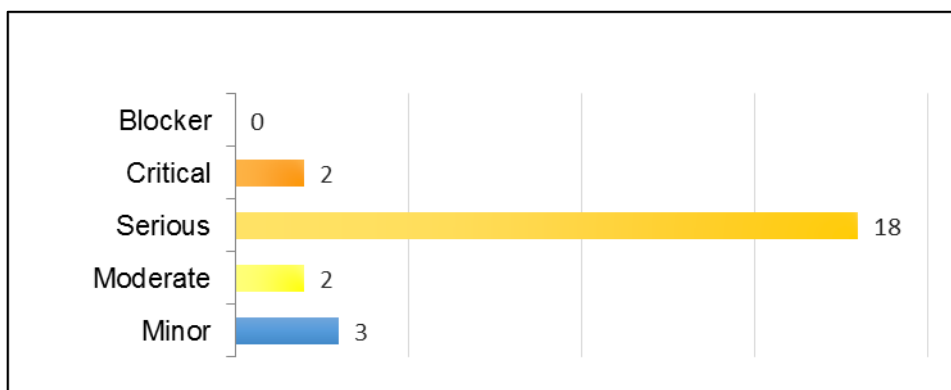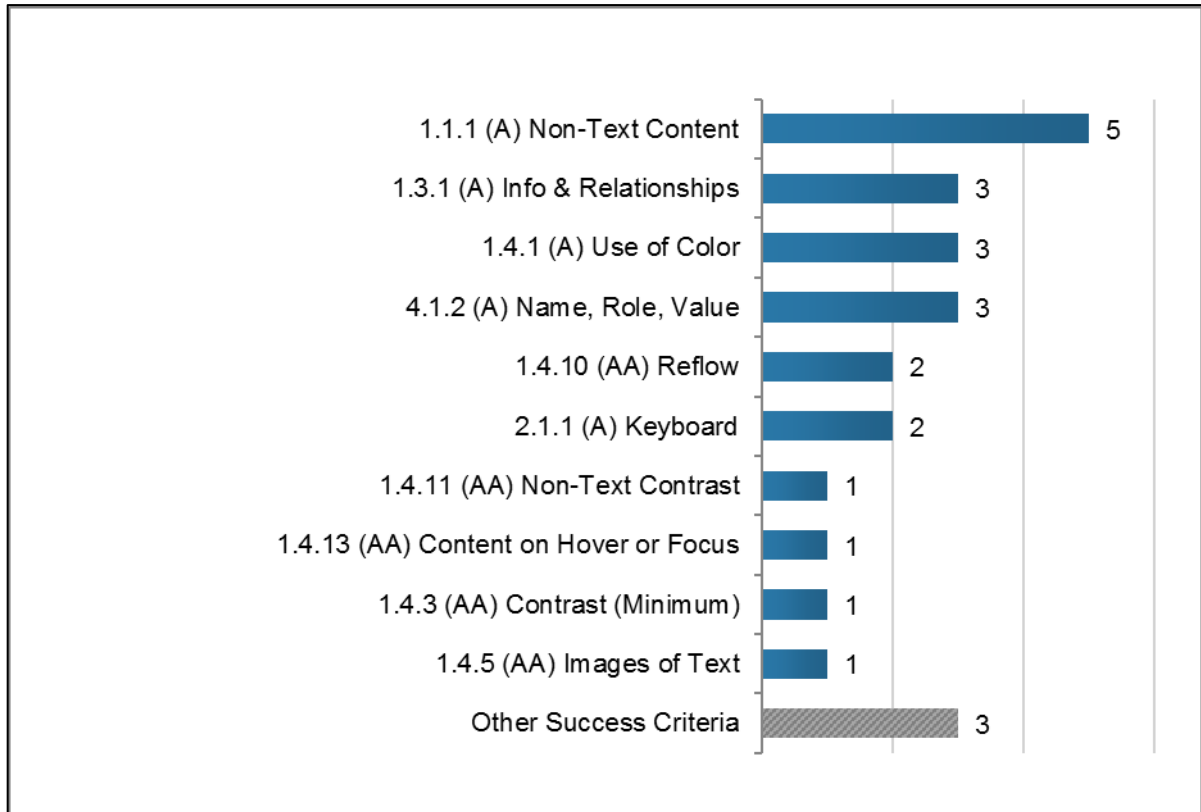

Figure 1.9.1: No. of WCAG Issues

Figure 1.9.2: WCAG Compliance

User Impact

The majority of WCAG 2.1 SC failures were classified as having a "Serious" user impact (n=79), with the second highest number classified as "Critical" (n=24). No "Blocker" issues were identified (Figure 1.9.3).
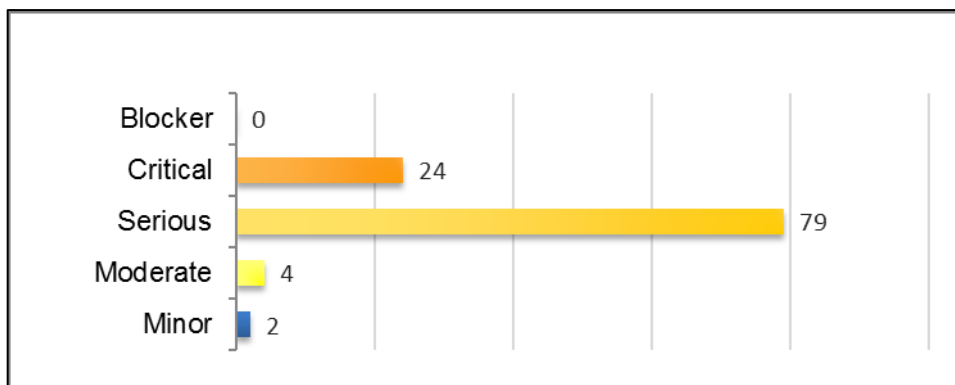
Figure 1.9.3: No. of WCAG errors by User Impact

WCAG issues

Four success criteria, were related to 49% of all issues:

- Name, Role, Value – 17%
- Non-text Contrast – 14%
- Info and Relationships – 12%
- Focus Visible– 6%

The top 10 issues are listed in Figure 1.9.4.
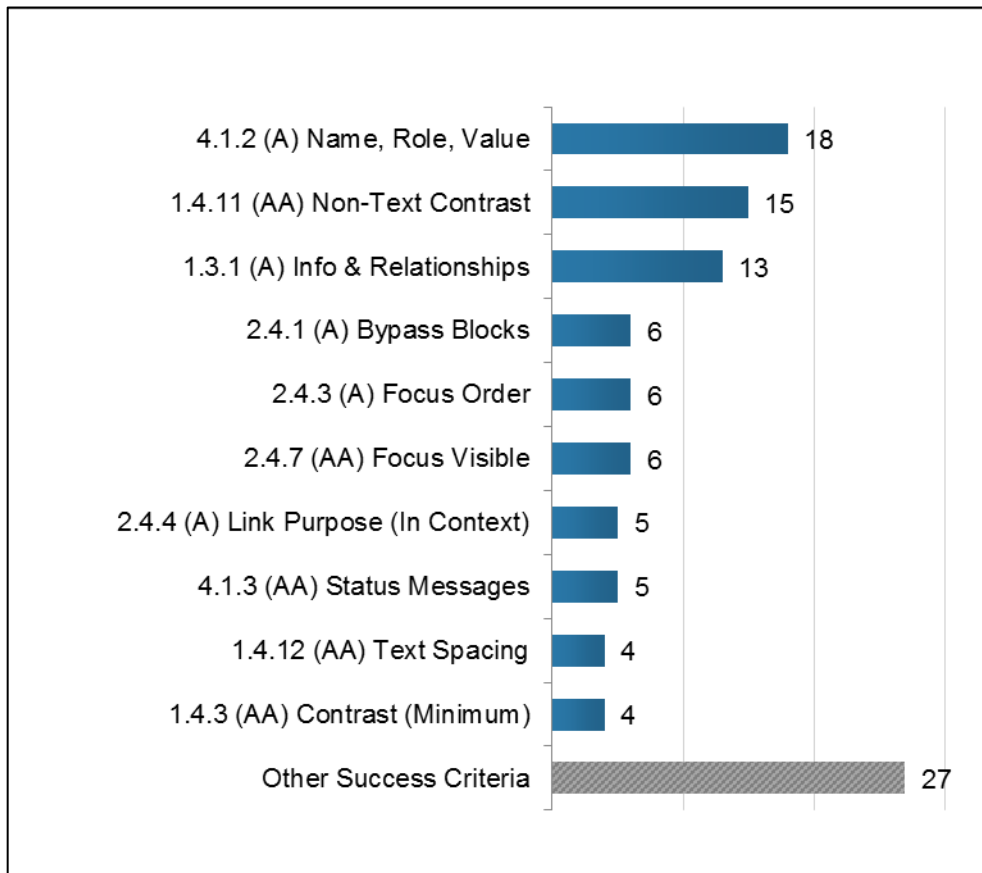
Figure 1.9.4: Top 10 WCAG Issues

Link to accessible table

EN 301 549 issues
No EN 301 549 errors found.

10. Office of the Ombudsman[18]

Key Findings

In total, 81 issues (81 WCAG and 0 additional EN 301 549 specific) were identified across 12 pages and 8 components assessed (Figure 1.10.1). This equates to a compliance rate of 56% for the WCAG 2.1 SC tested (Figure 1.10.2).
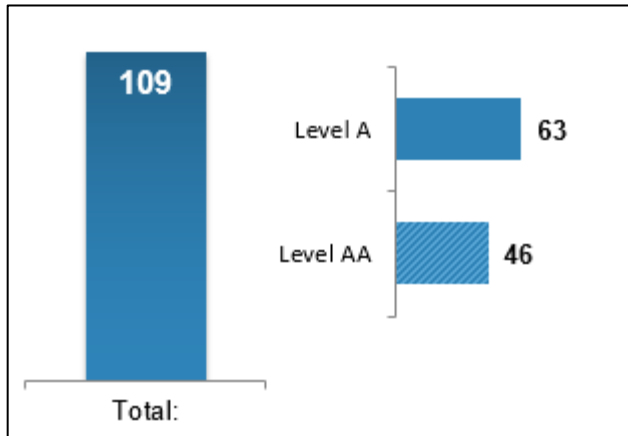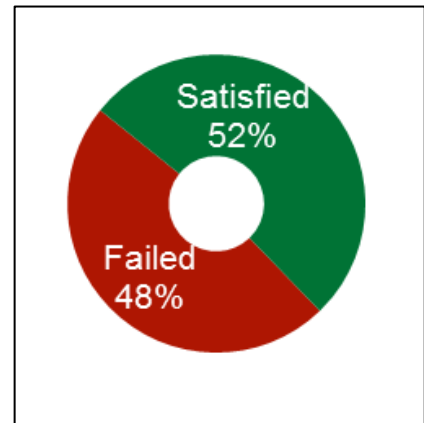

Figure 1.10.1: No. WCAG issues

Figure 1.10.2: WCAG Compliance

User Impact

The majority of WCAG 2.1 SC failures were classified as having a "Serious" user impact (n=44), with the second highest number classified as "Critical" (n=31). No "Blocker" issues were identified (Figure 1.10.3).

Figure 1.10.3: No. of WCAG errors by User Impact

WCAG issues

Four success criteria, were related to 47% of all issues:
- Info and Relationships – 22%
- Name, Role and Value – 13%
- Meaningful Sequence – 6%

18

- Non-Text Content – 6%

The top 10 issues are listed in Figure 1.10.4.
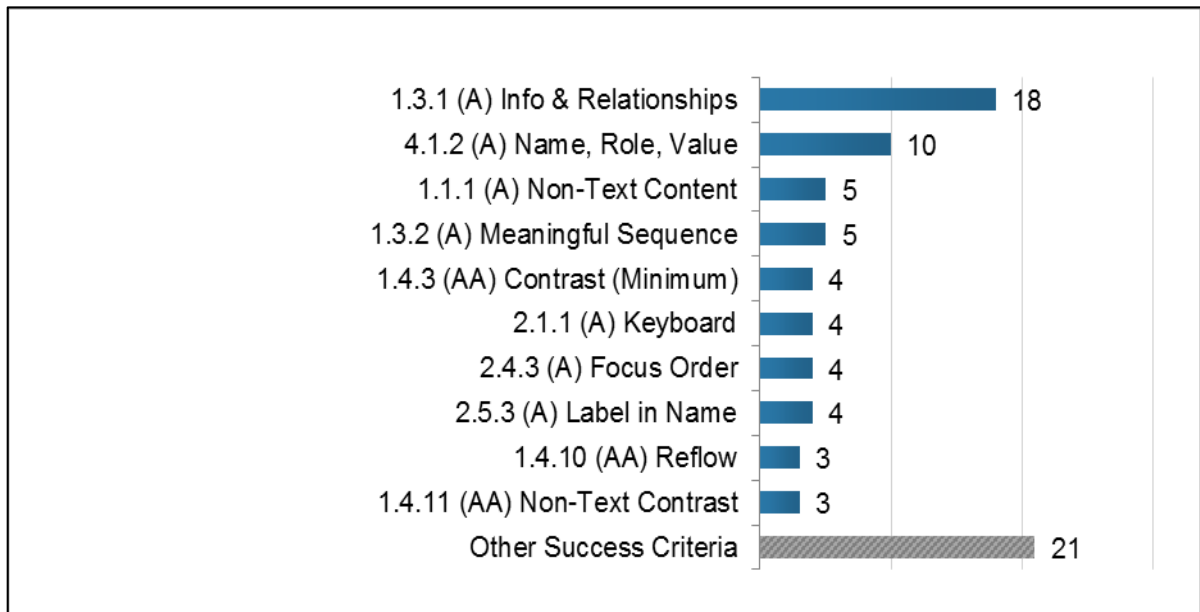
Figure 1.10.4: Top 10 WCAG Issues

[Link to accessible table](#)

EN 301 549 issues

No 301 549 errors found.

11. Public Appointments Service[19]

Key Findings

In total, 150 issues (148 WCAG and 2 additional EN 301 549 specific) were identified across 9 pages and 5 components assessed (Figure 1.11.1). This equates to a compliance rate of 58% for the WCAG 2.1 SC tested (Figure 1.11.2).

Figure 1.11.1: No. of WCAG Issues

Figure 1.11.2: WCAG Compliance

User Impact

The majority of WCAG 2.1 SC failures were classified as having a "Serious" user impact (n=127), with the second highest number classified as "Critical" (n=15). No "Blocker" issues were identified (Figure 1.11.3).

Figure 1.11.3: No. of WCAG errors by User Impact

WCAG issues

Four success criteria, were related to 73% of all issues:

- Name, Role, Value – 43%
- Text Contrast – 17%
- Info and Relationships – 8%

- Non-text Contrast – 5%

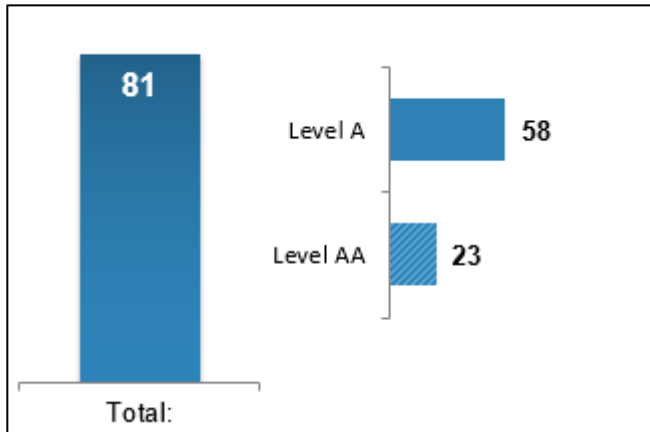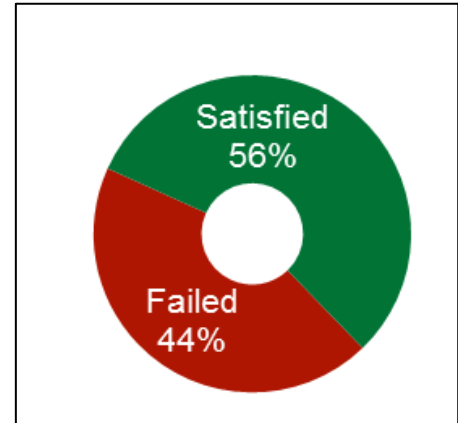The top 10 issues are listed in Figure 1.11.4.
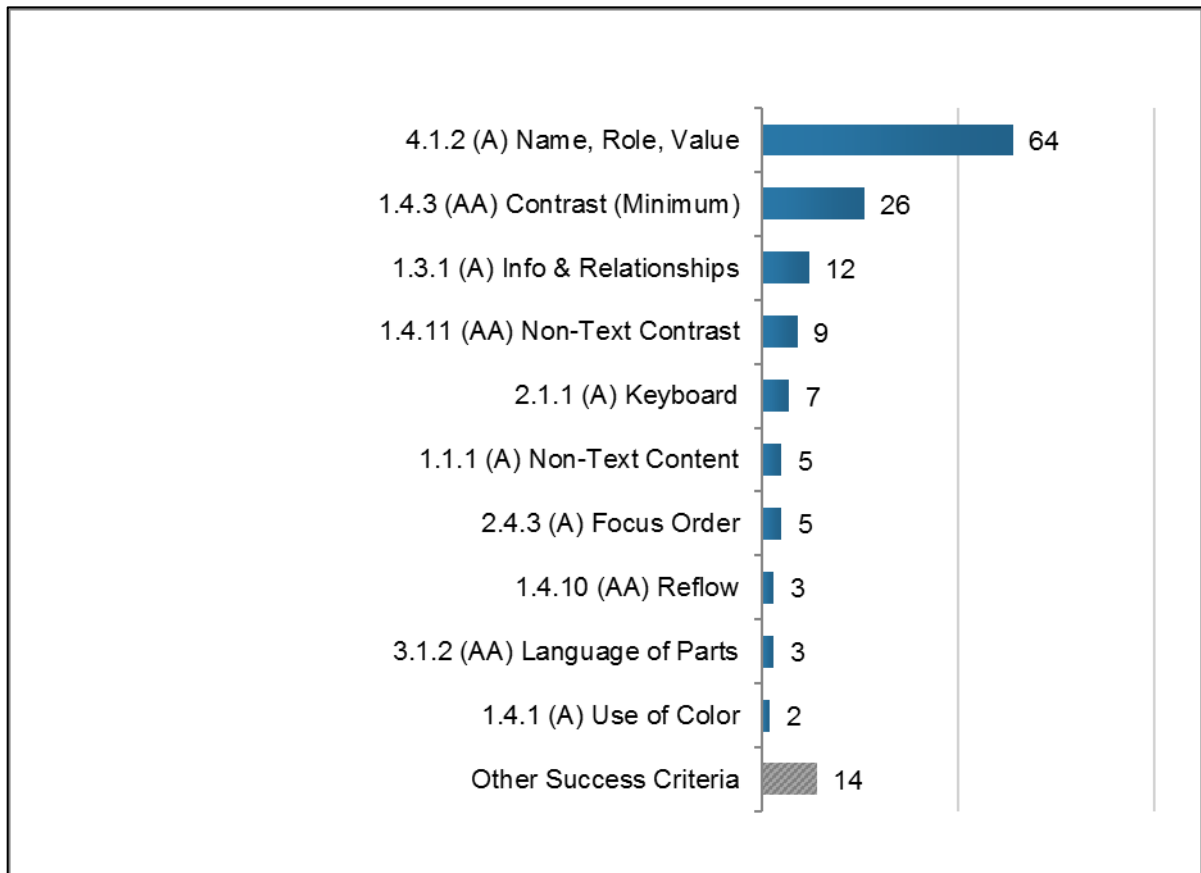
Figure 1.11.4: Top 10 WCAG Issues

Link to accessible table

EN 301 549 issues

Two EN 301 549 errors found.

12. Sligo County Council[20]

Key Findings

In total, 54 issues (54 WCAG and 0 additional EN 301 549 specific) were identified across 9 pages and 6 components assessed (Figure 1.12.1). This equates to a compliance rate of 62% for the WCAG 2.1 SC tested (Figure 1.12.2).

Figure 1.12.1: No. of WCAG Issues

Figure 1.12.2: WCAG Compliance

User Impact

The majority of WCAG 2.1 SC failures were classified as having a "Serious" user impact (n=40), with the second highest number classified as "Critical" (n=7). No "Blocker" issues were identified (Figure 1.12.3).
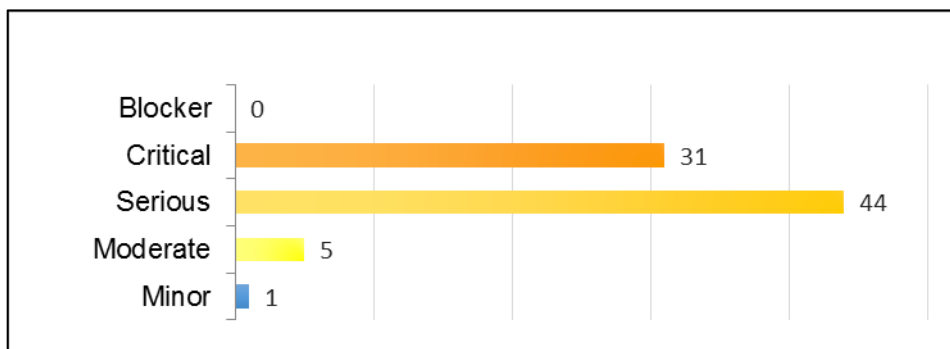
Figure 1.12.3: No. of WCAG errors by User Impact

WCAG issues

Four success criteria, were related to 56 % of all issues:
- Colour Contrast – 19%
- Info and Relationships – 19%
- Name, Role, Value – 11 %
- Non-Text Contrast – 7 %
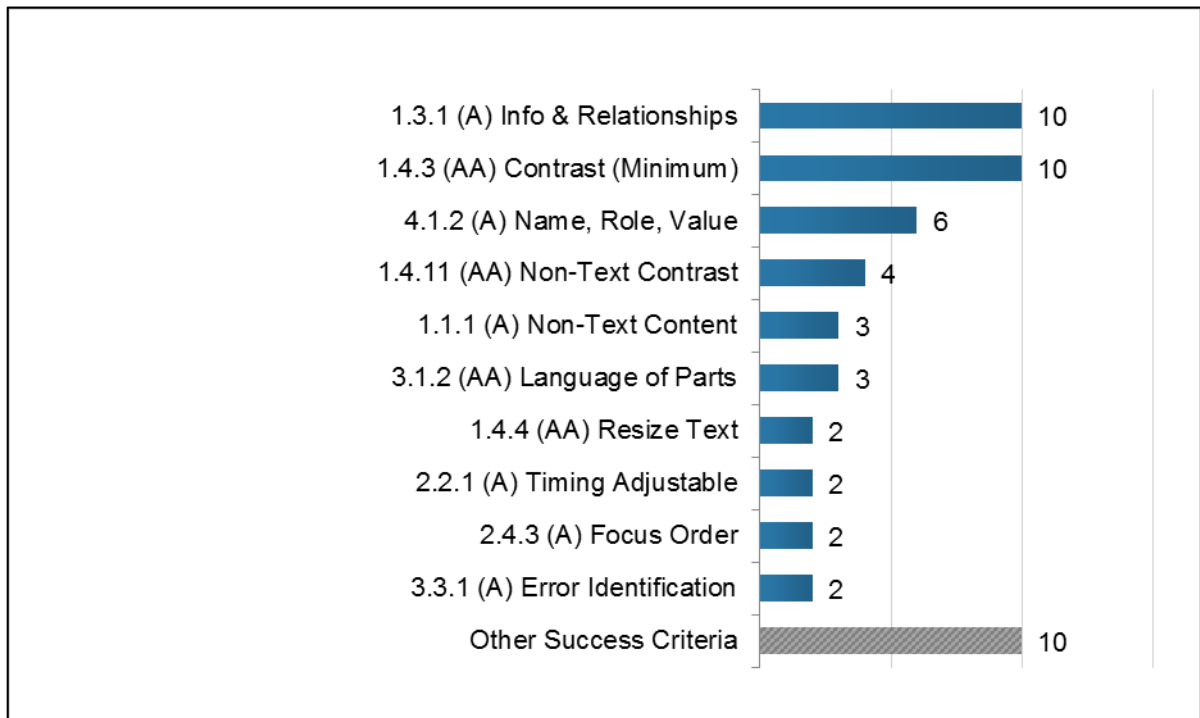
20

The top 10 issues are listed in Figure 1.12.4.

Figure 1.12.4: Top 10 WCAG Issues

Link to accessible table

EN 301 549 issues
Two EN 301 549 errors found.

13. University of Limerick[21]

Key findings

In total, 154 issues (152 WCAG and 0 additional EN 301 549 specific) were identified across 8 pages and 3 components assessed (Figure 1.13.1). This equates to a compliance rate of 56% for the WCAG 2.1 SC tested (Figure 1.13.2).
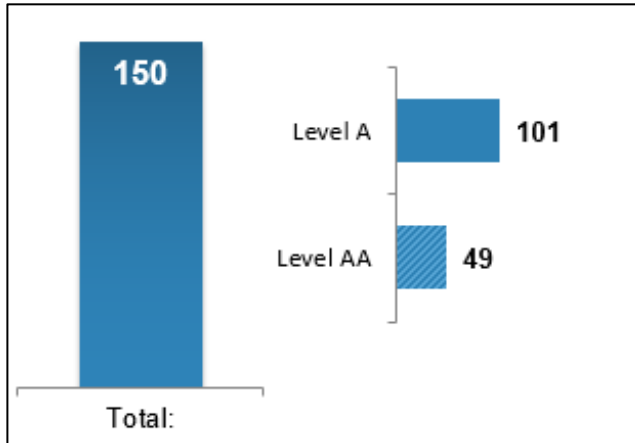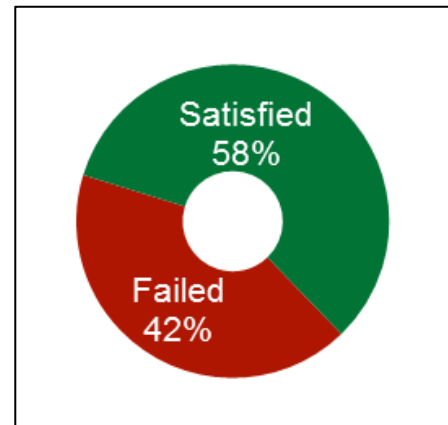

Figure 1.13.1: No. of WCAG Issues

Figure 1.13.2: WCAG Compliance

User Impact

The majority of WCAG 2.1 SC failures were classified as having a "Serious" user impact (n=100), with the second highest number classified as "Critical" (n=43). No "Blocker" issues were identified (Figure 1.13.3).
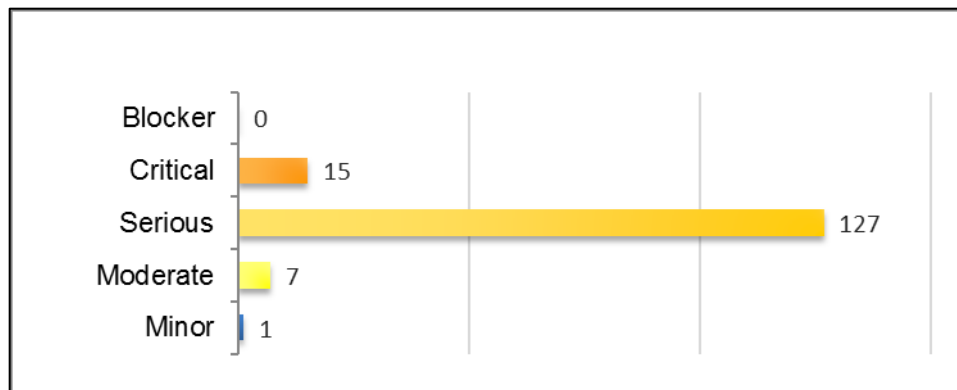

Figure 1.13.3: No. of WCAG errors by User Impact

WCAG issues

Four success criteria, were related to 64% of all issues:

- Parsing – 22%

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[21]

- Contrast (Minimum) – 21%
- Info and Relationships – 11%
- Name, Role and Value – 10%

The top 10 issues are listed in Figure 1.13.4.
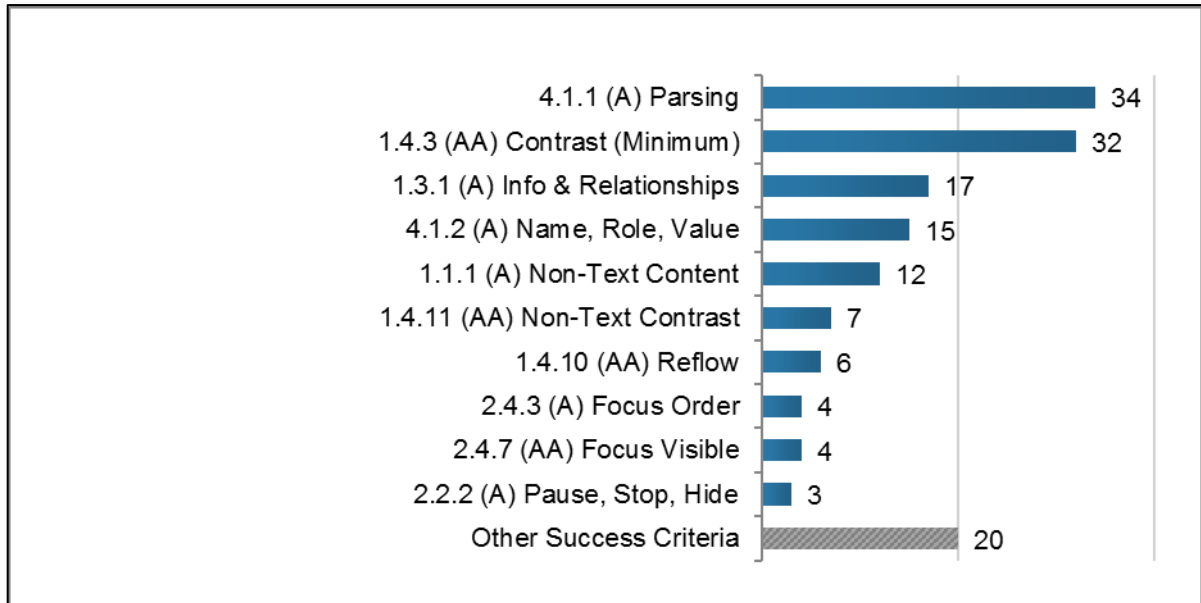
Figure 1.13.4: Top 10 WCAG Issues

[Link to accessible table](#)

EN 301 549 issues
No EN 301 549 errors found.

14. Workplace Relations Commission[22]

Key findings

In total, 55 issues (54 WCAG and 1 additional EN 301 549 specific) were identified across 11 pages and 7 components assessed (Figure 1.14.1). This equates to a compliance rate of 54% for the WCAG 2.1 SC tested (Figure 1.14.2).
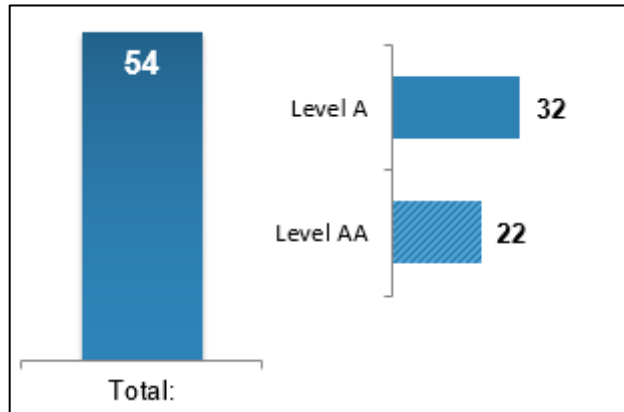

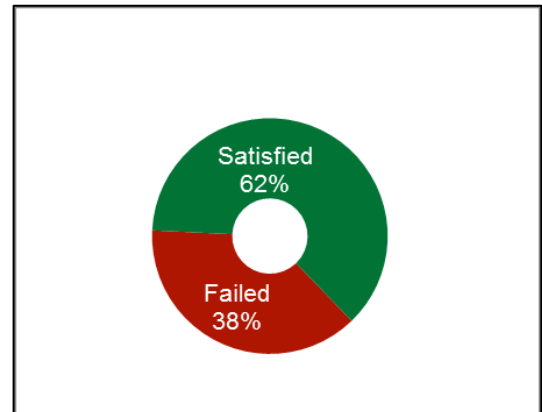**Figure 1.14.1 No. of WCAG Issues**

Figure 1.14.2: WCAG Compliance

User Impact

The majority of WCAG 2.1 SC failures were classified as having a "Serious" user impact (n=40), with the second highest number classified as "Critical" (n=10). No "Blocker" issues were identified (Figure 1.14.3).
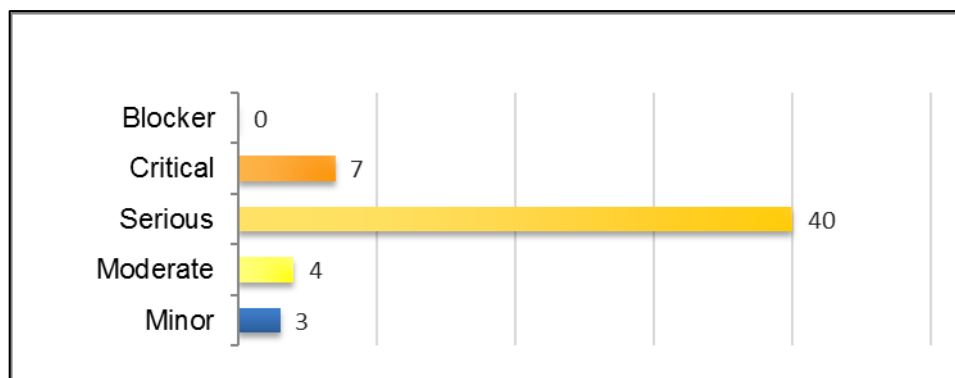

Figure 1.14.3: No of WCAG errors by User Impact

WCAG issues

Four success criteria, were related to 36% of all issues:
- Name, Role, Value – 9 %
- Keyboard – 9 %

- Reflow – 9 %
- Info and Relationships – 9 %

The top 10 issues are listed in Figure 1.14.4.
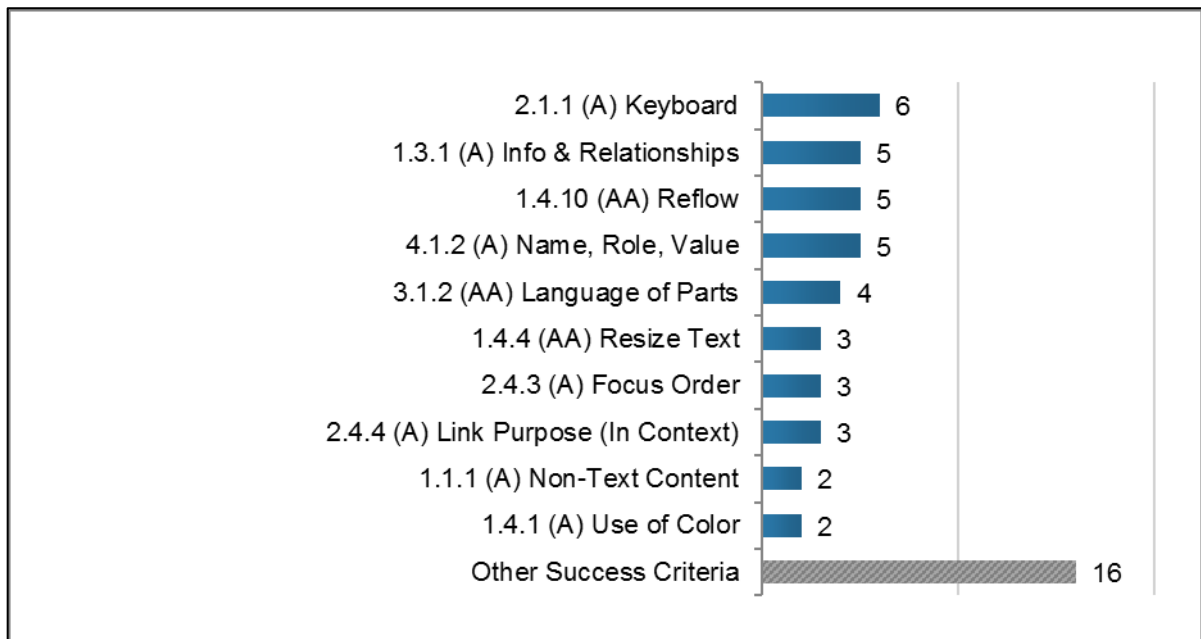
Figure 1.14.4: Top 10 WCAG Issues

[Link to accessible table](#)

EN 301 549 issues
One EN 301 549 error found.

15. National Council for Special Education[23]

Key findings

In total, 159 issues (155 WCAG and 4 additional EN 301 549 specific) were identified across 10 pages and 4 components assessed (Figure 1.15.1). This equates to a compliance rate of 52% for the WCAG 2.1 SC tested (Figure 1.15.2).
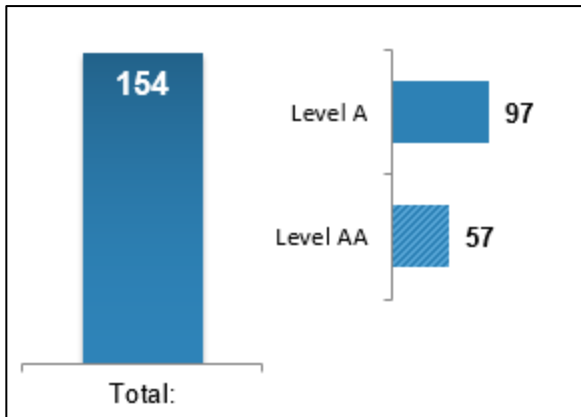

Figure 1.15.1: No. of WCAG Issues

Figure 1.15.2: WCAG Compliance

User Impact

The majority of WCAG 2.1 SC failures were classified as having a "Serious" user impact (n=111), with the second highest number classified as "Critical" (n=27). No "Blocker" issues were identified (Figure 1.15.3).

Figure 1.15.3: No. of WCAG errors by User Impact

WCAG issues

Four success criteria, were related to 58% of all issues:

- Name, Role, Value – 18%
- Text Contrast – 18%
- Info and Relationships – 14%

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[23] https://ncse.ie/

- Non-text Contrast – 8%

The top 10 issues are listed in Figure 1.15.4.
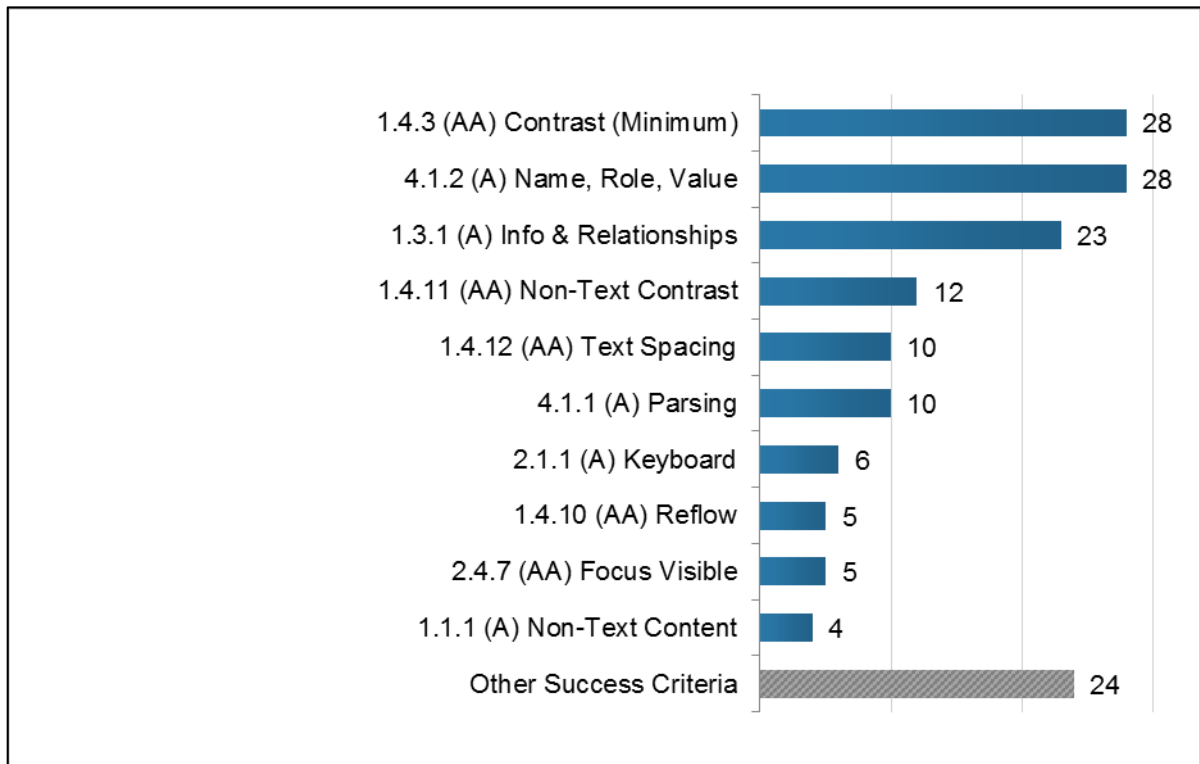
Figure 1.15.4: Top 10 WCAG Issues

Link to accessible table

EN 301 549 issues
Four EN 301 549 errors found.

16. Housing Agency [24]

Key findings

In total, 199 issues (199 WCAG and 1 additional EN 301 549 specific) were identified across 11 pages and 7 components assessed (Figure 1.16.1). This equates to a compliance rate of 52% for the WCAG 2.1 SC tested (Figure 1.16.2).

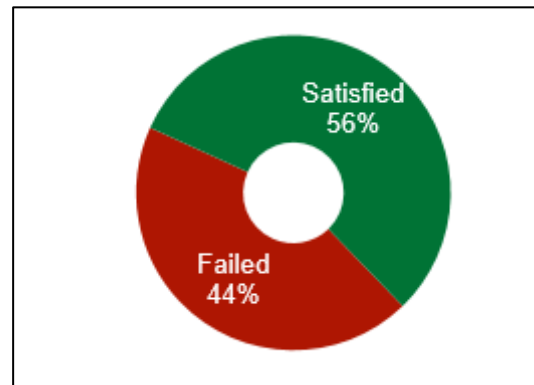**Figure 1.16.1: No. of WCAG Issues**

Figure 16.2: WCAG Compliance

User Impact

The majority of WCAG 2.1 SC failures were classified as having a "Serious" user impact (n=95), with the second highest number classified as "Critical" (n=53). No "Blocker" issues were identified (Figure 1.16.3).
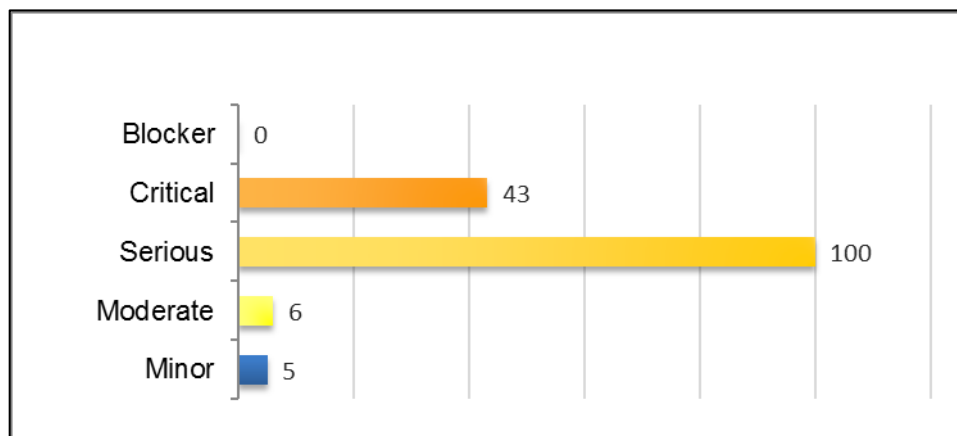

Figure 1.16.3: No. of WCAG errors by User Impact

WCAG issues

Four success criteria were related to 64% of all issues:
- Parsing – 35%

---

[24] The Housing Agency works towards delivering sustainable and affordable housing for all. https://www.housingagency.ie/

- Name, Role, Value – 18%
- Info and Relationships – 6%
- Non-Text Content – 6%
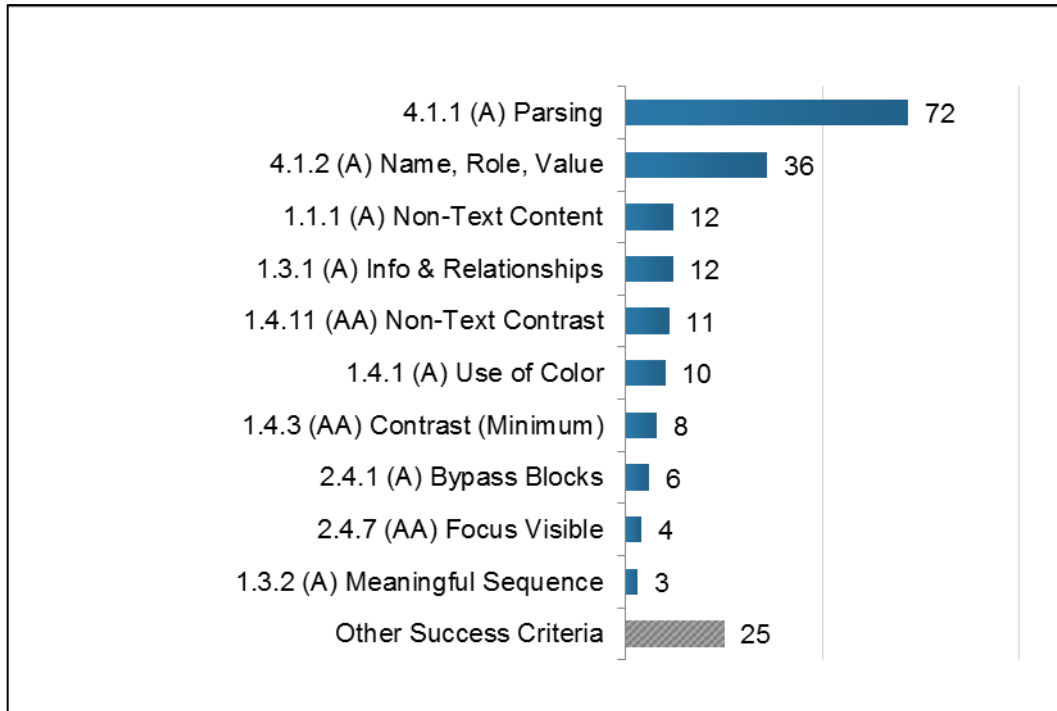
The top 10 issues are listed in Figure 1.16.4.

Figure 1.16.4: Top 10 WCAG Issues

Link to accessible table

EN 301 549 issues
One EN 301 549 error found.

17. Solas[25]

Key findings

In total, 79 issues (79 WCAG and 0 additional EN 301 549 specific) were identified across 8 pages and 3 components assessed (Figure 1.17.1). This equates to a compliance rate of 68% for the WCAG 2.1 SC tested (Figure 1.17.2).
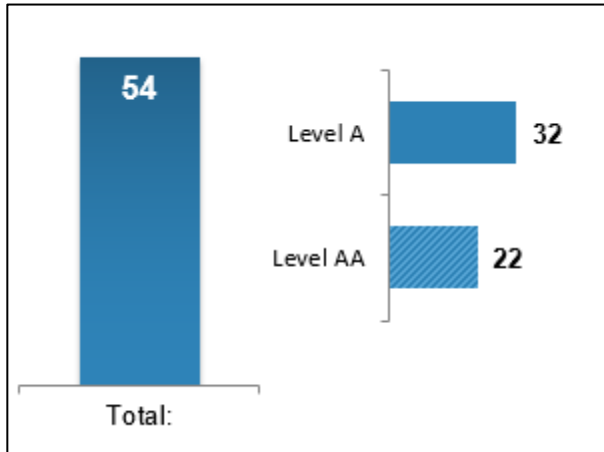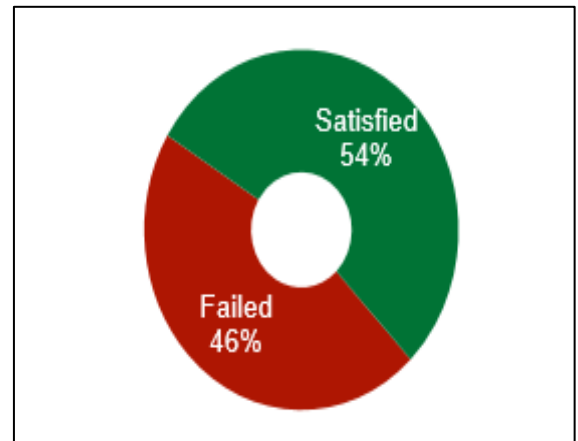

Figure 1.17.1: No. of WCAG issues

Figure 1. 17.2: WCAG Compliance

User Impact

The majority of WCAG 2.1 SC failures were classified as having a "Serious" user impact (n=58), with the second highest number classified as "Critical" (n=11). No "Blocker" issues were identified (Figure 1.17.3).
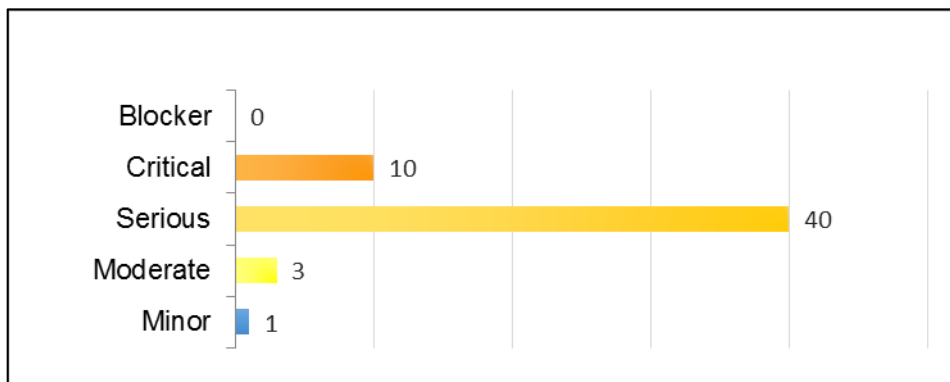

Figure 1.17.3: No. of WCAG errors by User Impact

WCAG issues

Four success criteria, were related to 65% of all issues:
- Info and Relationships – 29%

---

[25] SOLAS is the State agency that oversees the Further Education & Training (FET) sector in Ireland, https://www.solas.ie/

- Name, Role, Value – 20 %
- Parsing – 8 %
- Keyboard – 8 %

The top 10 issues are listed in Figure 1.17.4.
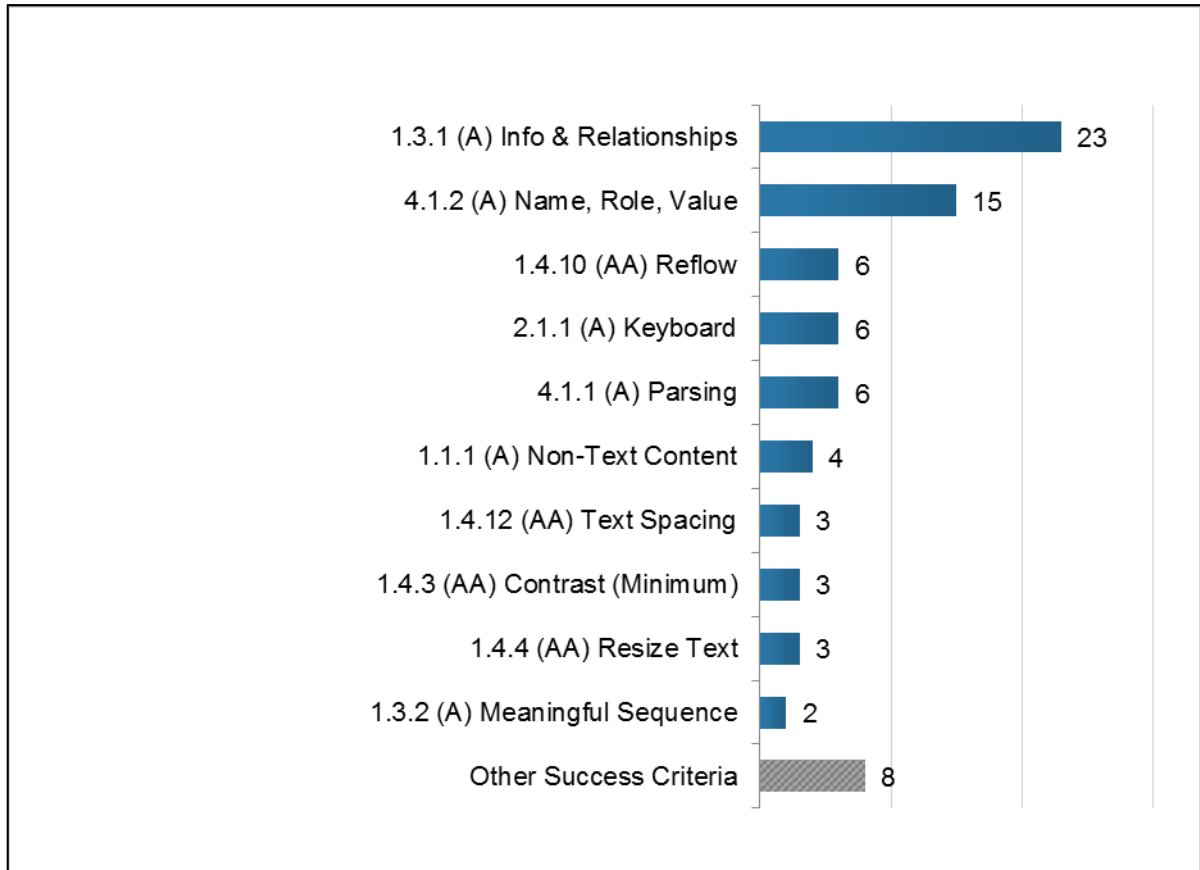
Figure 1.17.4: Top 10 WCAG Issues

Link to accessible table

EN 301 549 issues
No EN 301 549 error found.

18. Mayo County Council[26]

Key findings

In total, 92 issues (87 WCAG and 5 additional EN 301 549 issues) were identified across 6 pages and 7 components assessed (Figure 1.18.1). This equates to a compliance rate of 60% for the WCAG 18.1 SC tested (Figure 1.18.2).
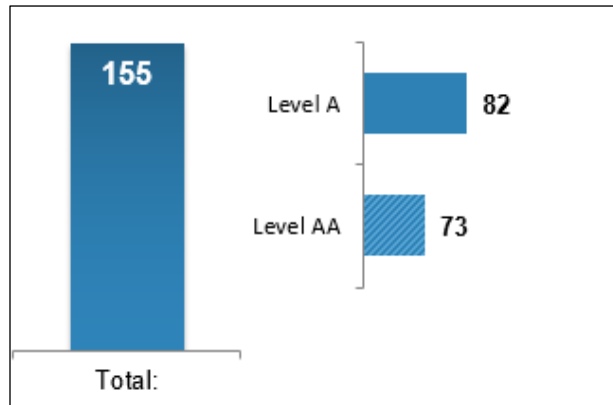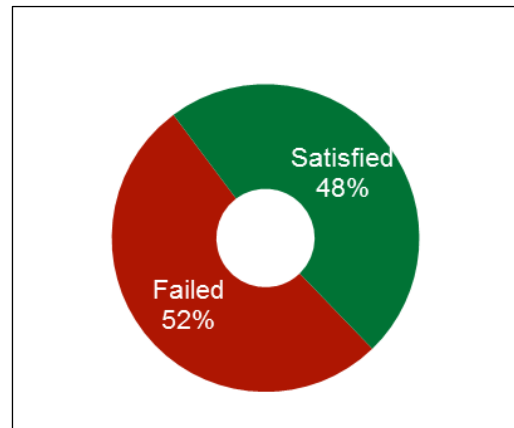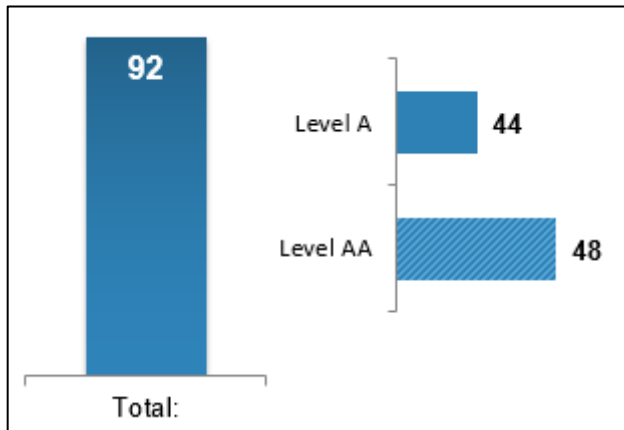

Figure 1.18.1: No. of WCAG Issues2

Figure 1.18.2: WCAG Compliance

User Impact

The majority of WCAG 2.1 SC failures were classified as having a "Serious" user impact (n=74), with the second highest number classified as "Critical" (n=10). No "Blocker" issues were identified (Figure 1.18.3).
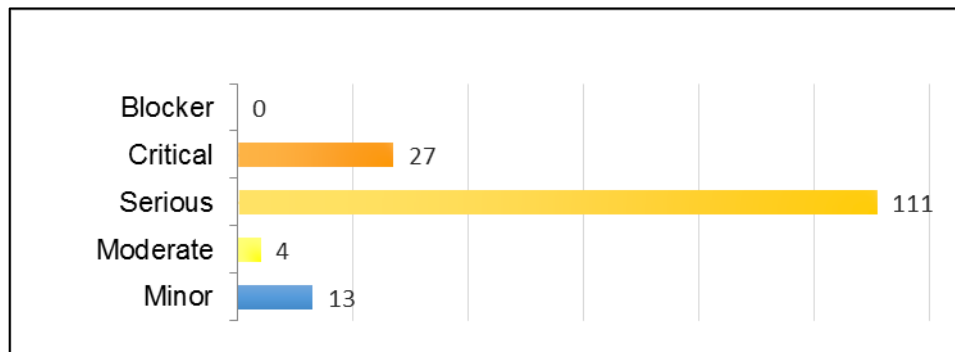

Figure 1.18.3: No. of WCAG errors by User Impact

WCAG issues

Four success criteria were related to 64% of all WCAG issues:
- Contrast (Minimum) – 34%

- Info and Relationships – 12%
- Name, Role, Value – 11%
- Non-text Contrast – 7%

The top 10 issues are listed in Figure 1.18.4.
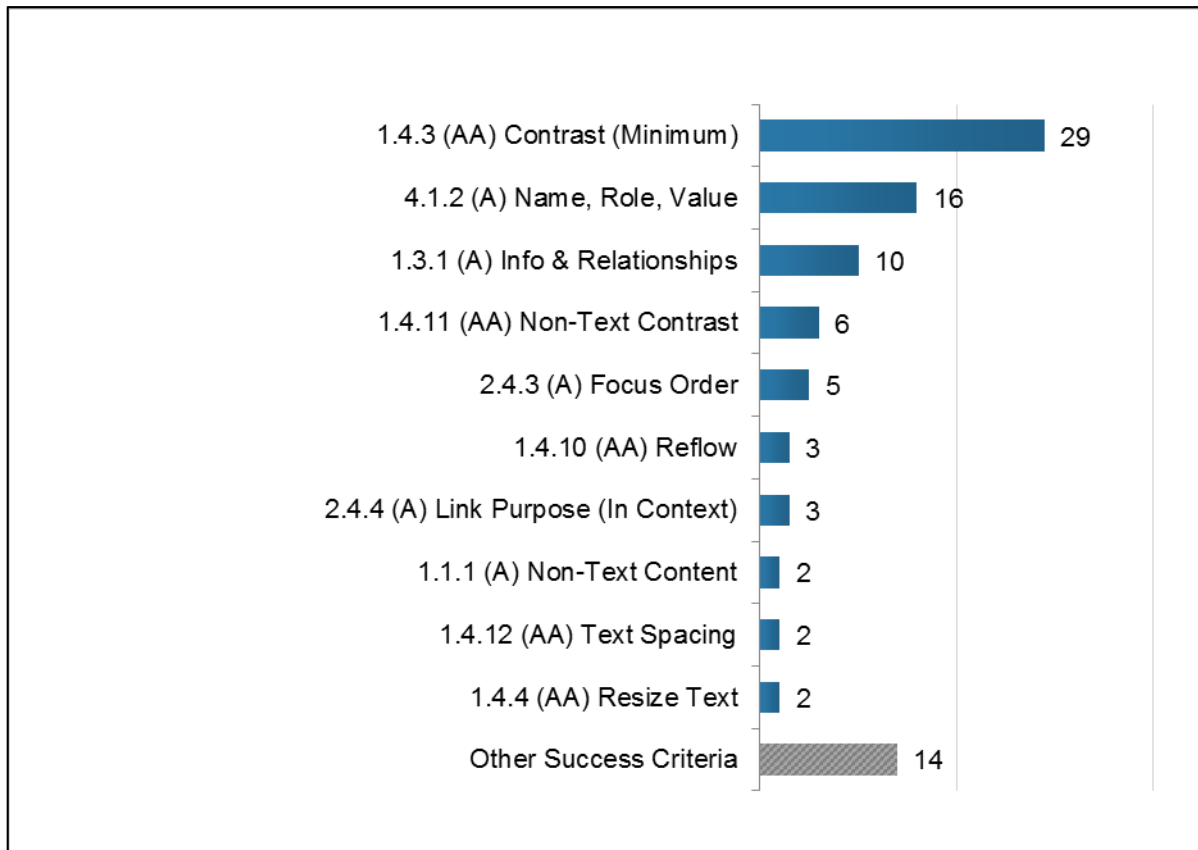
Figure 1.18.4: Top 10 WCAG Issues

[Link to accessible table](#)

EN 301 549 issues

Five EN 301 549 errors found.

19. myAccount (Revenue) [27]

Key findings

In total, 196 issues (196 WCAG and 0 additional EN 301 549 issues) were identified across 18 pages and 4 components assessed (Figure 1.19.1). This equates to a compliance rate of 52% for the WCAG 19.1 SC tested (Figure 1.19.2).
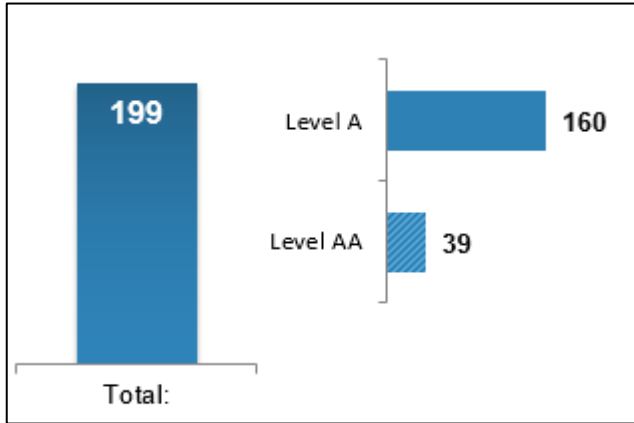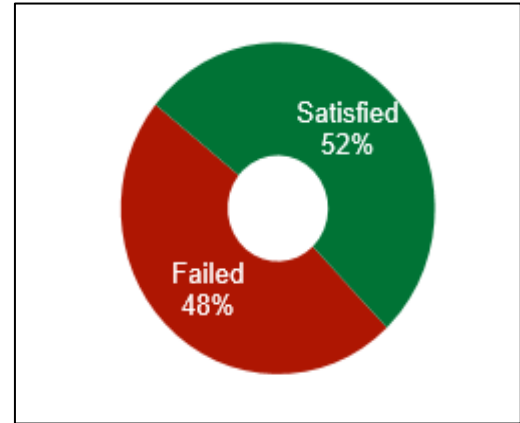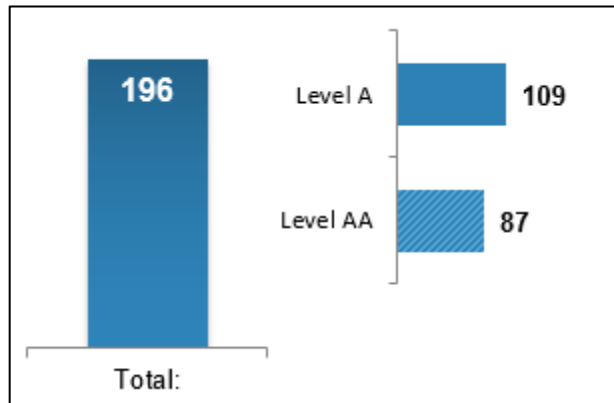

Figure 1.19.1: No. of WCAG Issues

Figure 1.19.2: WCAG Compliance

User Impact

The majority of WCAG 2.1 SC failures were classified as having a "Serious" user impact (n=154), with the second highest number classified as "Critical" (n=34). No "Blocker" issues were identified (Figure 1.19.3).
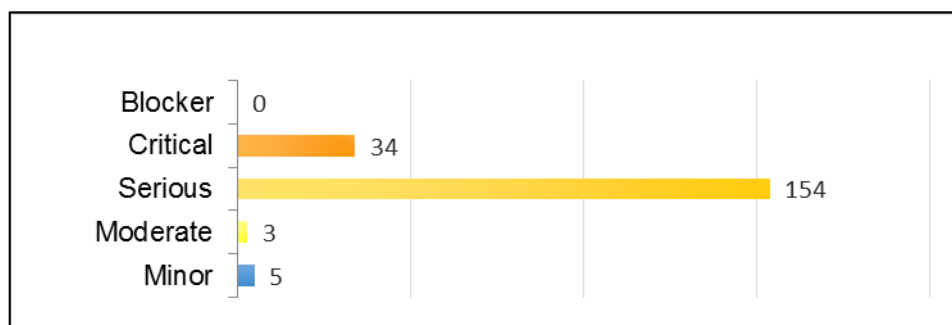
Figure 1.19.3: No. of WCAG errors by User Impact

WCAG issues

Four success criteria were related to 53% of all WCAG issues:
- Contrast (Minimum) – 24%
- Name, Role, Value – 12%

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[27] https://www.ros.ie/myaccount-web/sign_in.html?execution=e1s1 single access point for secure online services

- Info and Relationships – 9%
- Page Titled – 8%

The top 10 issues are listed in Figure 1.19.4.
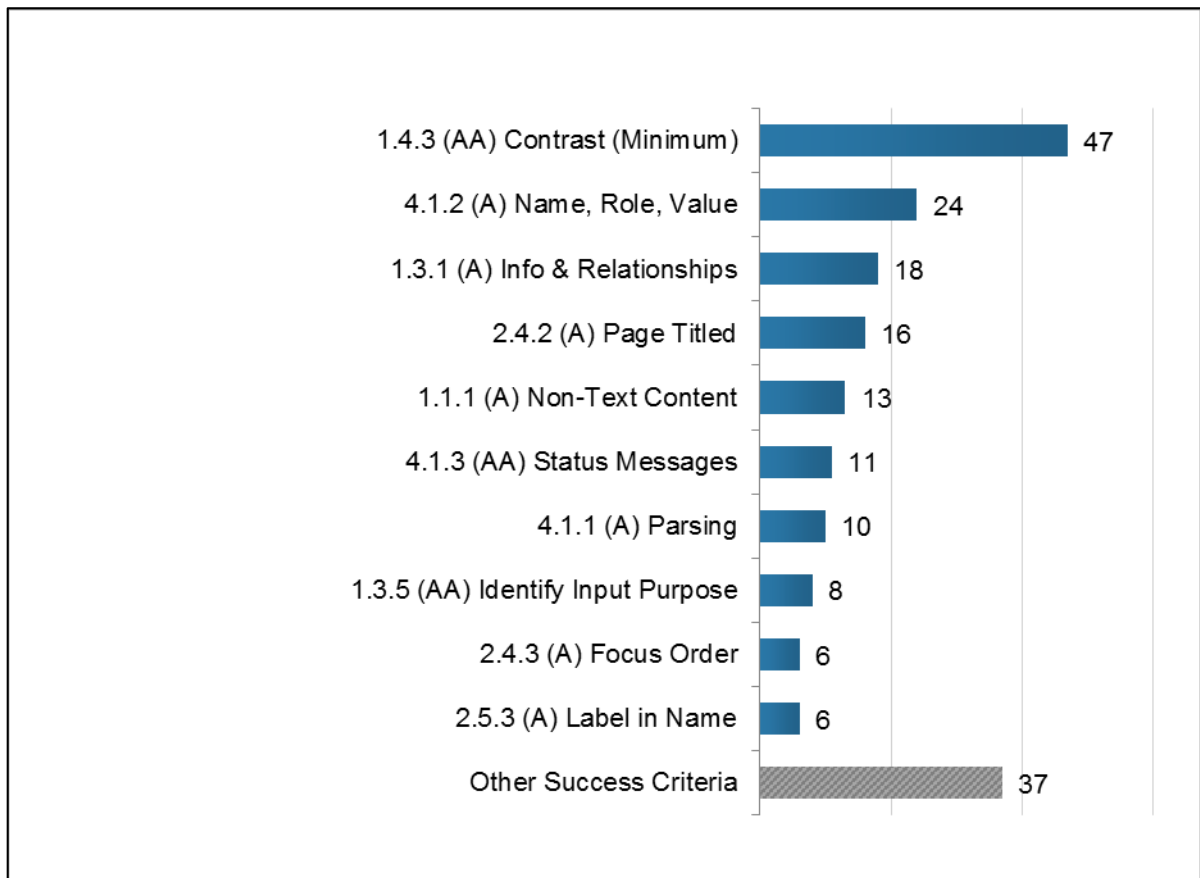
Figure 1.19.4: Top 10 WCAG Issues

Link to accessible table

EN 301 549 issues
No EN 301 549 error found.

20. National Concert Hall [28]

Key findings

In total, 146 issues (146 WCAG and 0 additional EN 301 549 issues) were identified across 10 pages and 4 components assessed (Figure 1.20.1). This equates to a compliance rate of 58% for the WCAG 20.1 SC tested (Figure 1.20.2).
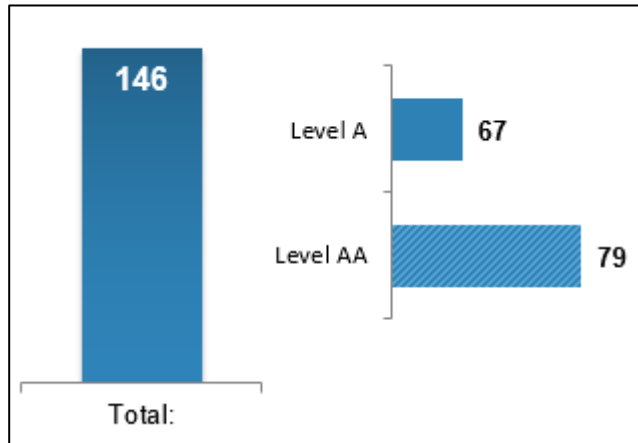
Figure 1.20.1: No. of WCAG Issues

Figure 1.20.2: WCAG Compliance

User Impact

The majority of WCAG 2.1 SC failures were classified as having a "Serious" user impact (n=121), with the second highest number classified as "Critical" (n=17). No "Blocker" issues were identified (Figure 1.20.3).
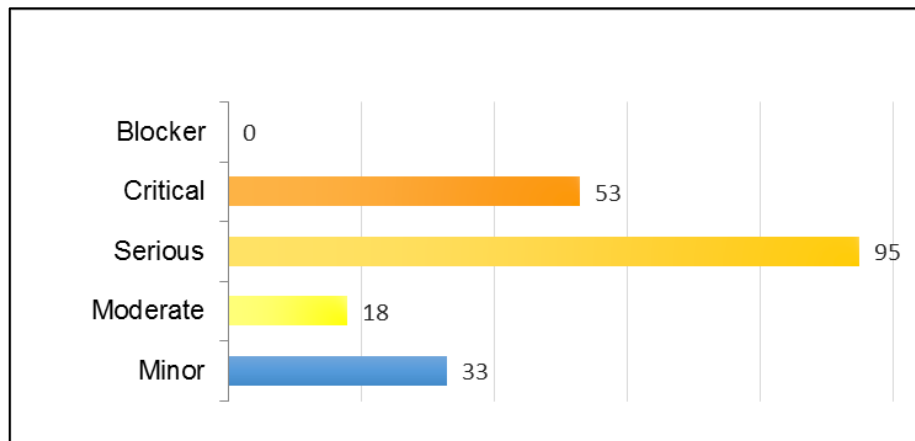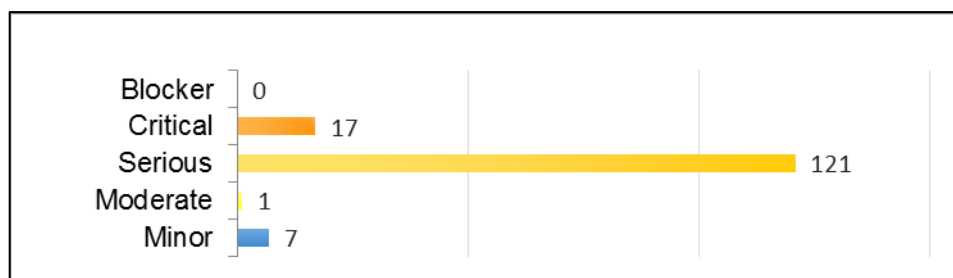

Figure 1.20.3: No. of WCAG errors by User Impact

WCAG issues

Four success criteria, were related to 65% of all issues:
- Contrast (Minimum) – 27%
- Non-text Contrast – 14%
- Name, Role and Value – 13%

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[28] https://www.nch.ie/ National Concert Hall of Ireland

- Info and Relationships – 11%

The top 10 issues are listed in Figure 1.20.4.
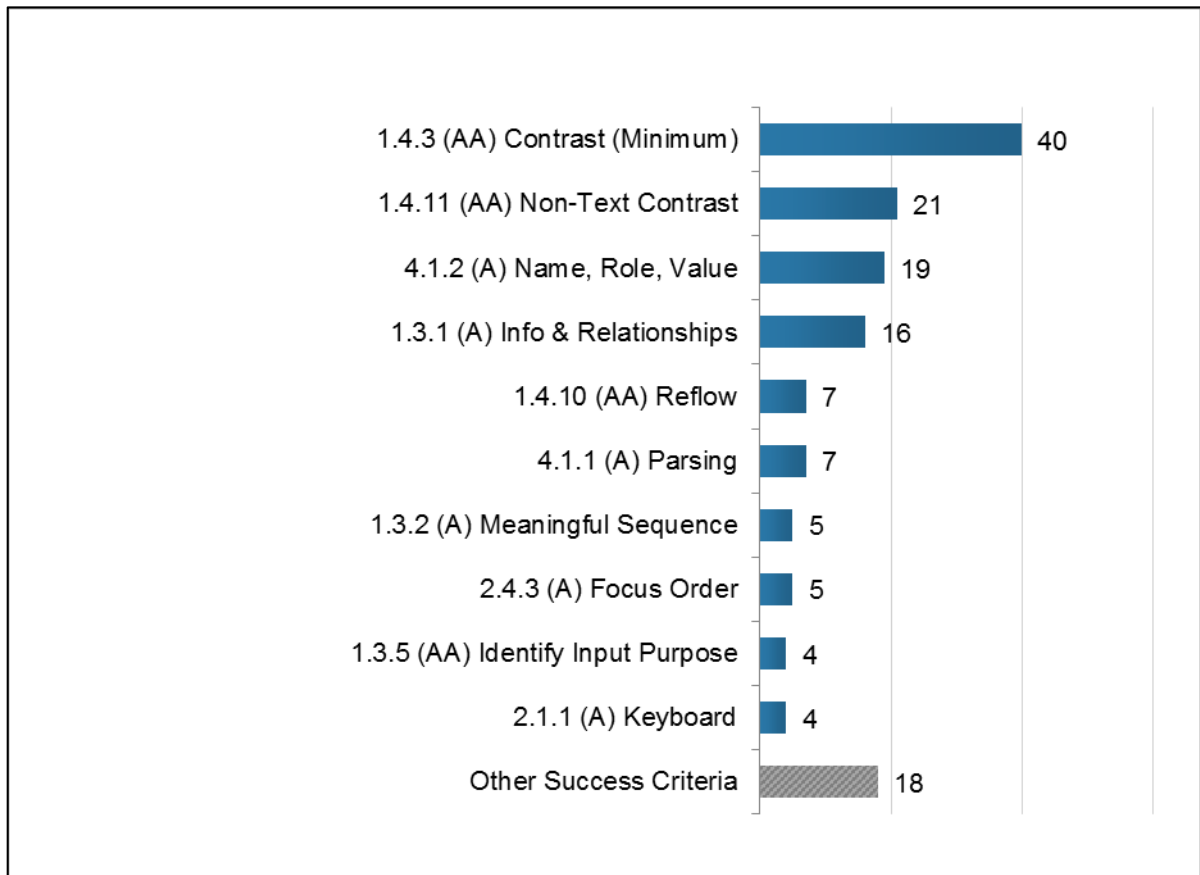
Figure 1.20.4: Top 10 WCAG Issues

Link to accessible table

EN 301 549 issues
No EN 301 549 error found.

21. Revenue Online Service (ROS)[29]

Key findings

In total, 379 issues (379 WCAG and 0 additional EN 301 549 issues) were identified across 15 pages and 2 components assessed (Figure 1.21.1). This equates to a compliance rate of 56% for the WCAG 2.1 SC tested (Figure 1.21.2).
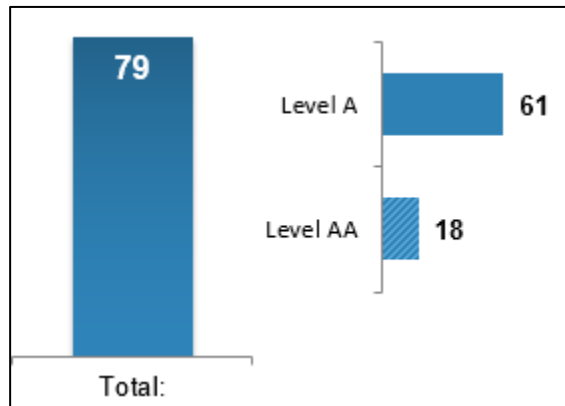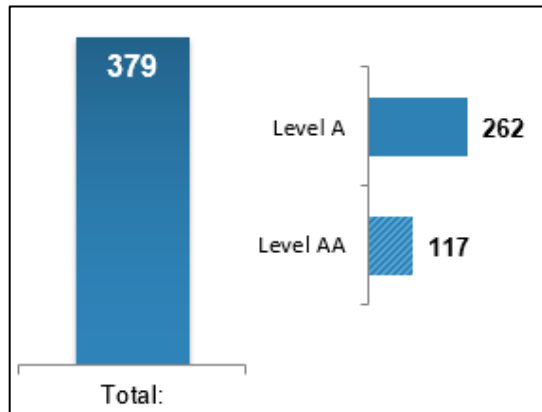

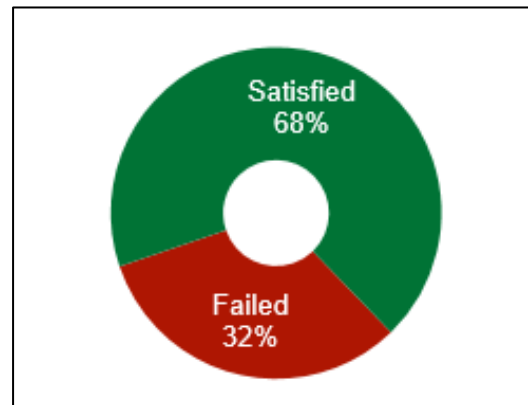Figure 1.21.1: No. of WCAG Issues3
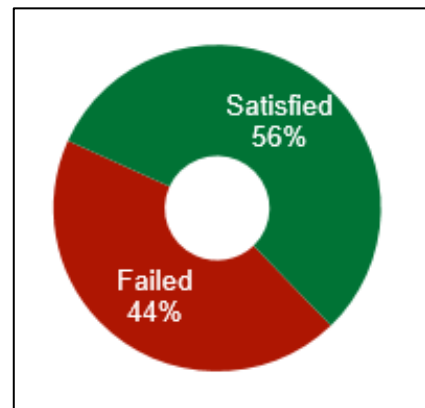
Figure 1.21.2: WCAG Compliance

User Impact

The majority of WCAG 2.1 SC failures were classified as having a "Critical" user impact (n=189), with the second highest number classified as "Serious" (n=184). No "Blocker" issues were identified (Figure 1.21.3).
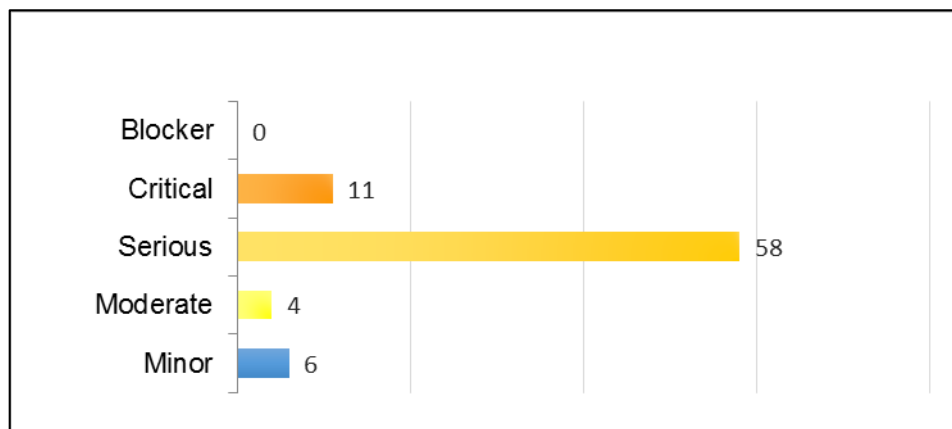

Figure 1.21.3: No. of WCAG errors by User Impact

WCAG issues

Four success criteria were related to 82% of all WCAG issues:

- Info and Relationships – 52%
- Contrast (Minimum) – 23%
- Name, Role, Value – 4%
- Language of Page – 3%

The top 10 issues are listed in Figure 1.21.4.
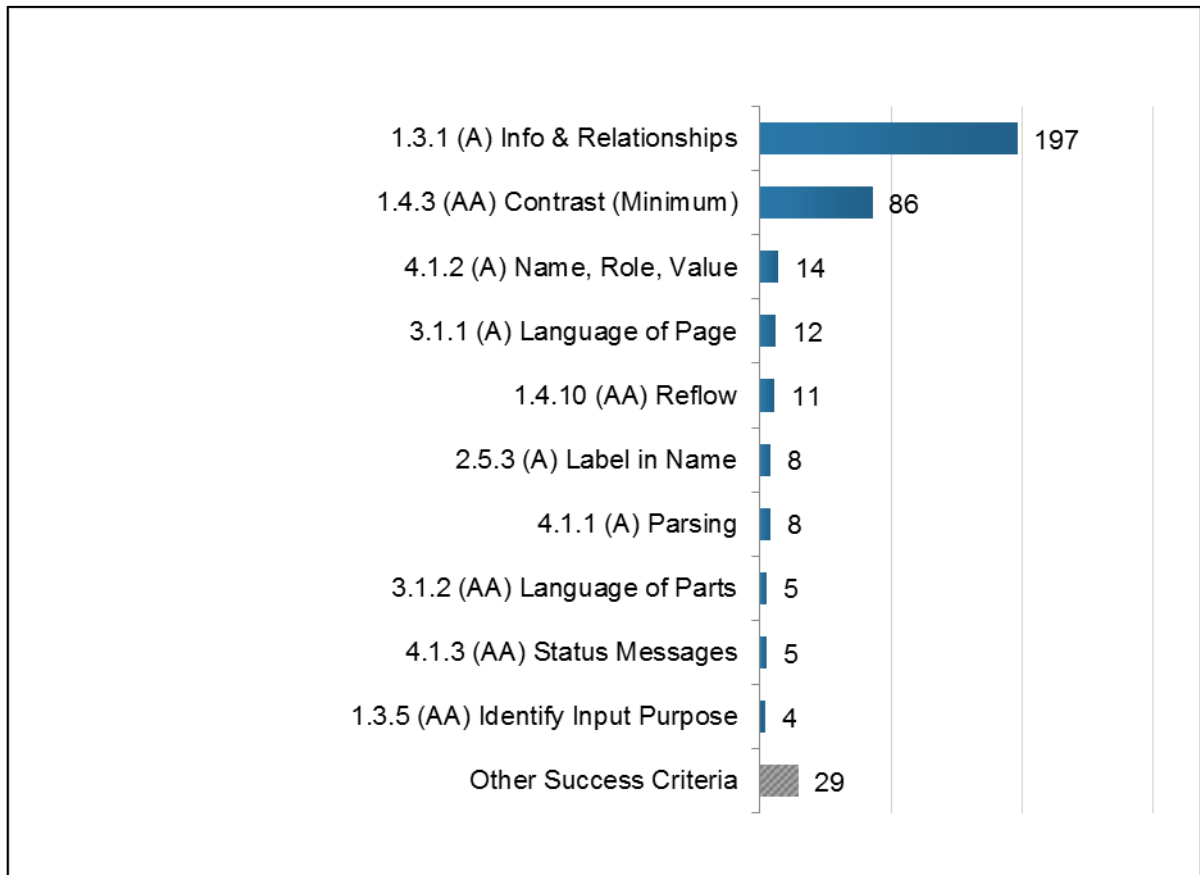
Figure 1.21.4: Top 10 WCAG Issues

Link to accessible table

EN 301 549 issues
No EN 301 549 errors found.

2. Mobile Apps

1. An Post App Android

Key findings

In total, 38 issues were identified across 7 screens (Figure 2.1.1). This equates to a compliance rate of 76% for the WCAG 2.1 SC tested (Figure 2.1.2).

Figure 2.1.1: No. of WCAG Issues

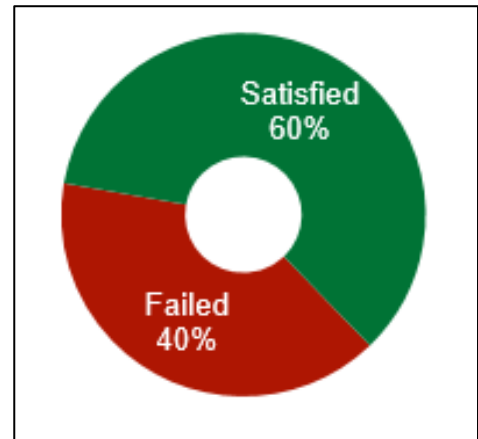**Figure 2.1.2: WCAG Compliance**

- 6 issues were related to colour contrast issues. These issues can often be corrected through a change in the style sheet.
- 5 issues were related to controls lacking an accessible name, role and value.
- 5 issues were related to visually hidden elements being exposed to screen reader users.

User Impact

The majority of WCAG 2.1 SC failures were classified as having a "Serious" user impact (n=25), with the second highest number classified as "Critical" (n=9). No "Blocker" issues were identified (Figure 2.1.3).
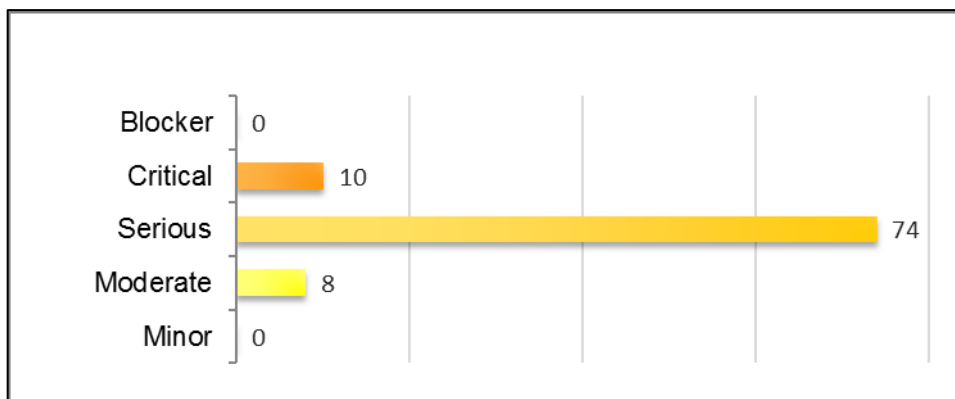

Figure 2.1.3: No. of WCAG errors by User Impact

The top 10 issues are listed in Figure 2.1.4.

Figure 2.1.4: Top 10 WCAG Issues

Link to accessible table

Accessibility Statement
No Accessibility Statement exists at present.

2. Dublin City Library App Android

Key findings

In total, 45 issues were identified across 10 screens (Figure 2.2.1). This equates to a compliance rate of 76% for the WCAG 2.1 SC tested (Figure 2.2.2).

Figure 2.2.1: No. of WCAG Issues

Figure 2.2.2: WCAG Compliance

- 6 issues were related to colour contrast issues. These issues can often be corrected through a change in the style sheet.
- 5 issues were related to controls lacking an accessible name, role and value.
- 5 issues were related to visually hidden elements being exposed to screen reader users.
- 17 issues were related to colour contrast issues. These issues can often be corrected through a change in the style sheet.
- 7 issues were related to screen reader users unable to perform basic actions central to the functionality of the app.
- 5 issues were related to controls lacking an accessible name, role and value.

User Impact

The majority of WCAG 2.1 SC failures were classified as having a "Serious" user impact (n=24), with the second highest number classified as "Critical" (n=11). No "Blocker" issues were identified (Figure 2.2.3).

Figure 2.2.3: No. of WCAG errors by User Impact

The top 10 issues are listed in Figure 2.2.4.

Figure 2.2.4: Top 10 WCAG Issues

[Link to accessible table](#)

Accessibility Statement

No Accessibility Statement exists at present.

3. Dublin City Library App iOS

Key findings

In total, 54 issues were identified across 10 screens (Figure 2.3.1). This equates to a compliance rate of 78% for the WCAG 2.1 SC tested (Figure 2.3.2).

Figure 2.3.1: No. of WCAG Issues

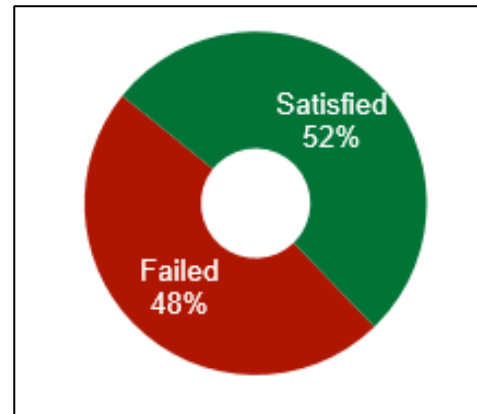**Figure 2.3.2: WCAG Compliance**

- 23 issues were related to colour contrast issues. These issues can often be corrected through a change in the style sheet.
- 11 issues were related to controls lacking an accessible name, role and/or value.
- 8 issues were related to informative images lacking descriptive alternative text or decorative images appropriately hidden from screen reader users.

User Impact

The majority of WCAG 2.1 SC failures were classified as having a "Serious" user impact (n=32), with the second highest number classified as "Critical" (n=7). No "Blocker" issues were identified (Figure 2.3.3).

Figure 2.3.3: No. of WCAG errors by User Impact

The top 10 issues are listed in Figure 2.3.4.

Figure 2.3.4: Top 10 WCAG Issues

[Link to accessible table](#)

Accessibility Statement
No Accessibility Statement exists at present.

4. HSE Covid Tracker App Android

Key findings

In total, 29 issues were identified across 14 screens (Figure 2.4.1). This equates to a compliance rate of 79% for the WCAG 2.1 SC tested (Figure 2.4.2).

Figure 2.4.1: No. of WCAG Issues

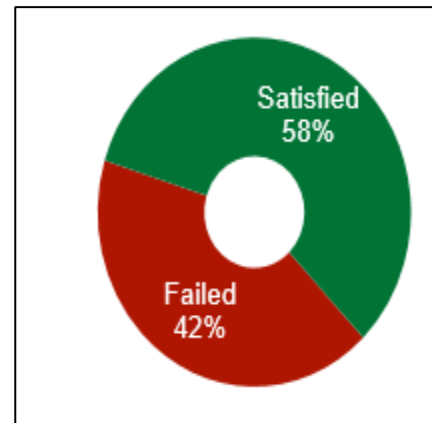**Figure 2.4.2: WCAG Compliance**

- 6 issues were related to colour contrast issues. These issues can often be corrected through a change in the style sheet.
- 9 issues were related to switch control users unable to perform basic actions central to the functionality of the app.
- 5 issues were related to images lacking descriptive alternative text.

User Impact

The majority of WCAG 2.1 SC failures were classified as having a "Critical" user impact (n=15), with the second highest number classified as "Serious" (n=11). No "Blocker" issues were identified (Figure 2.4.3).

Figure 2.4.3: No. of WCAG errors by User Impact

The top 10 issues are listed in Figure 2.4.4.

Figure 2.4.4: Top 10 WCAG Issues

[Link to accessible table](#)

Accessibility Statement
No Accessibility Statement exists at present.

5. HSE Covid Tracker App iOS

Key findings

In total, 29 issues were identified across 14 screens (Figure 2.5.1). This equates to a compliance rate of 72%for the WCAG 2.1 SC tested (Figure 2.5.2).
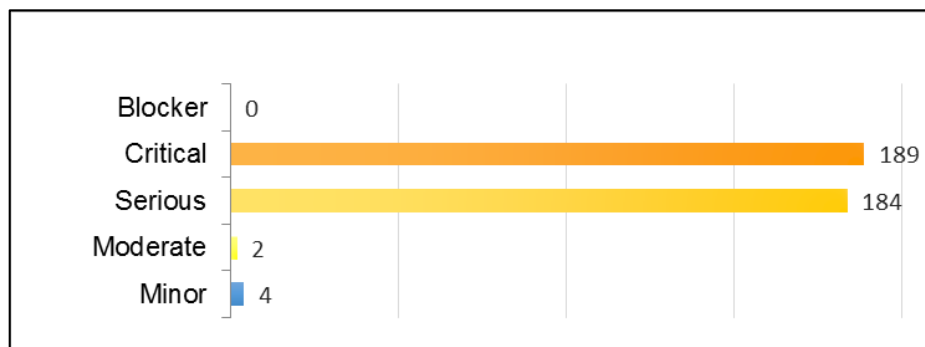

Figure 2.5.1: No. of WCAG Issues4
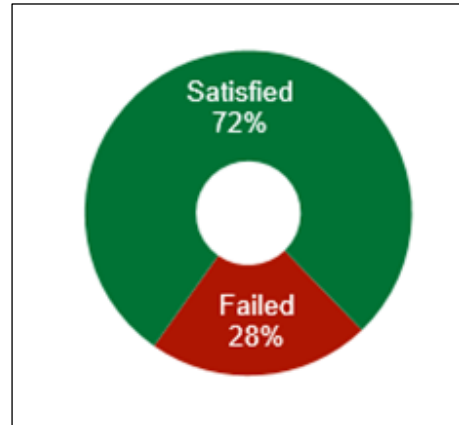
Figure 2.5.2: WCAG Compliance

- 7 issues were related to colour contrast issues. These issues can often be corrected through a change in the style sheet.
- 5 issues were related to images lacking descriptive alternative text.

User Impact

The majority of WCAG 2.1 SC failures were classified as having a "Serious" user impact (n=17), with the second highest number classified as "Critical" (n=9). No "Blocker" issues were identified (Figure 2.5.3).
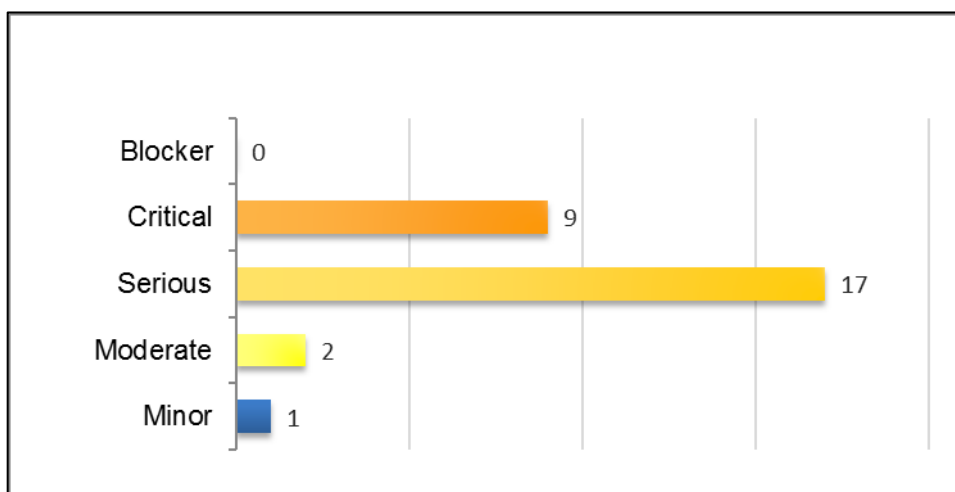
Figure 2.5.3: No. of WCAG errors by User Impact

The top 10 issues are listed in Figure 2.5.4.
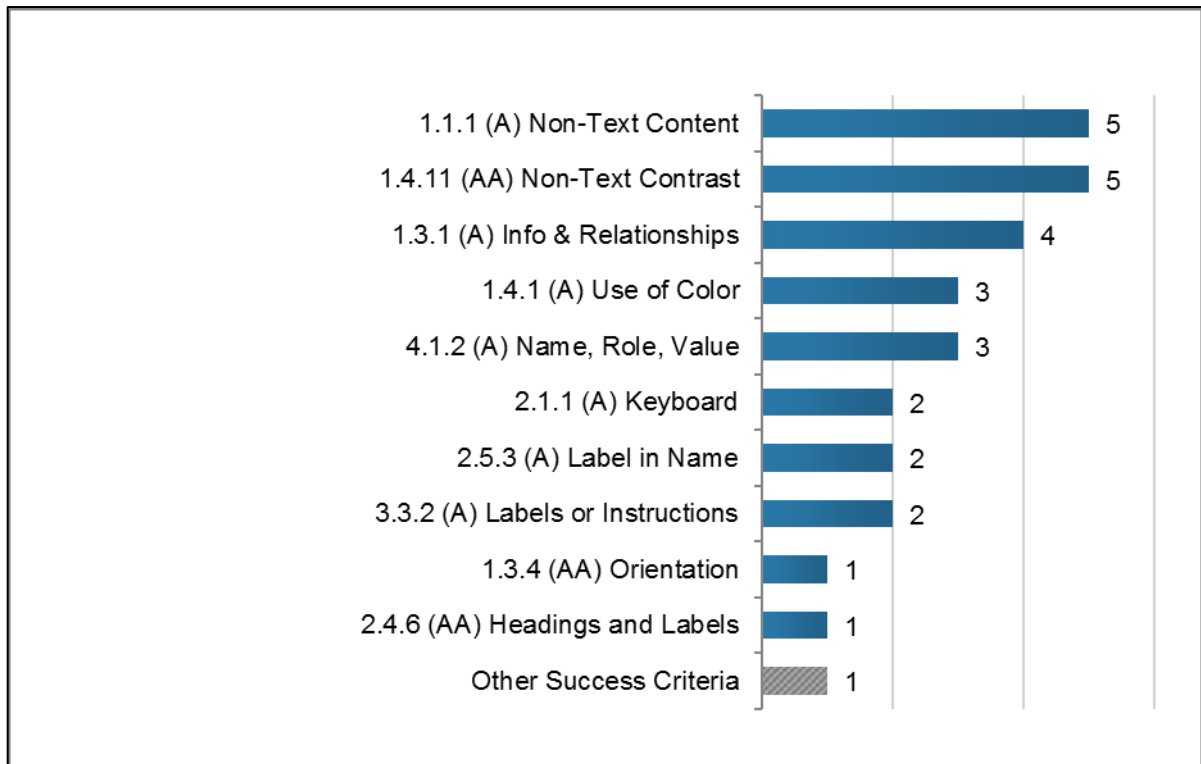
Figure 2.5.4: Top 10 WCAG Issues

[Link to accessible table](#)

Accessibility Statement
No Accessibility Statement exists at present.

6. HSE Health Passport App Android

Key findings

In total, 17 issues were identified across 4 screens (Figure 2.6.1). This equates to a compliance rate of 82% for the WCAG 2.1 SC tested (Figure 2.6.2).
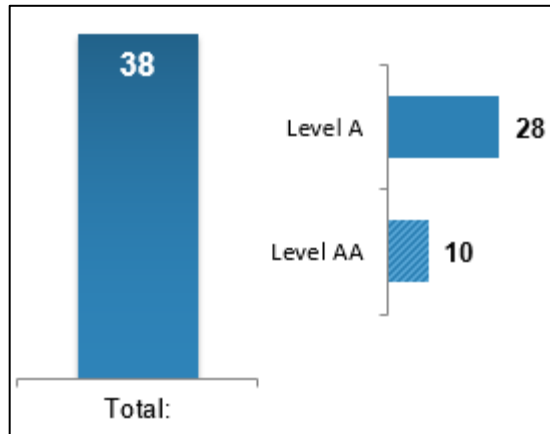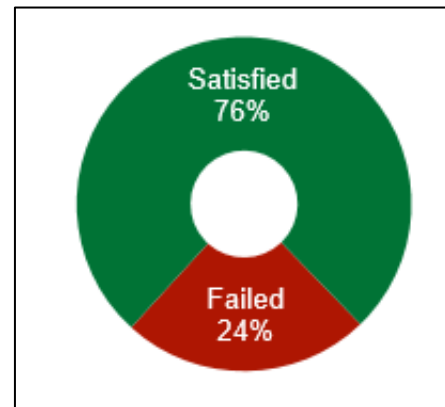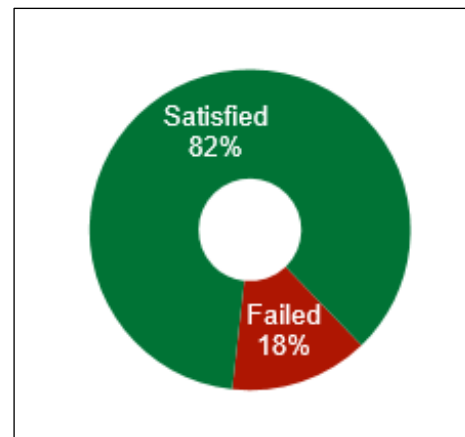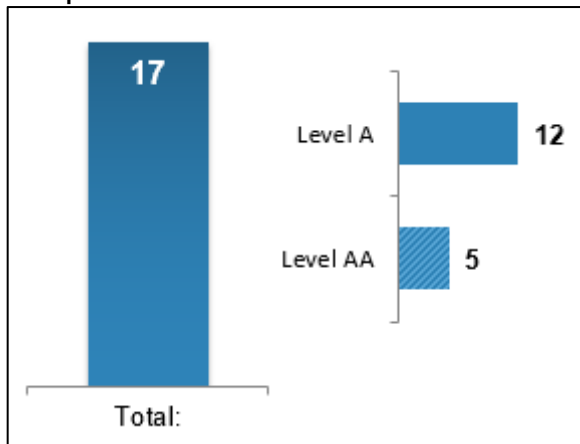
Figure 2.6.1: No. of WCAG Issues

Figure 2.6.2: WCAG Compliance

- 4 issues were related to colour contrast issues. These issues can often be corrected through a change in the style sheet.
- 6 issues were related to informative images lacking descriptive alternative text and decorative images not appropriately hidden from screen reader users.
- 3 issues were related to controls not having an accessible name, role and value.

User Impact

The majority of WCAG 2.1 SC failures were classified as having a "Serious" user impact (n=13), with the second highest number classified as "Critical" (n=2). No "Blocker" issues were identified (Figure 2.6.3).
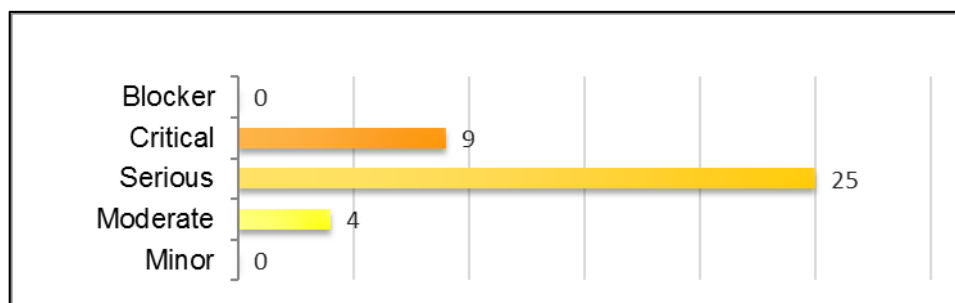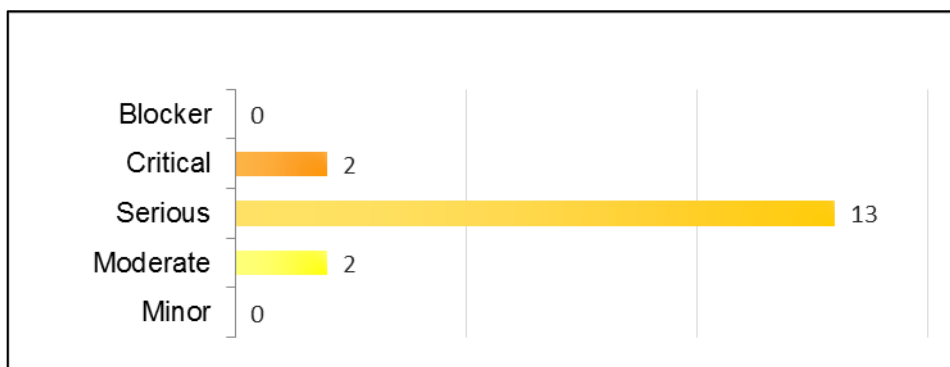
Figure 2.6.3: No. of WCAG errors by User Impact

The top 10 issues are listed in Figure 2.6.4.
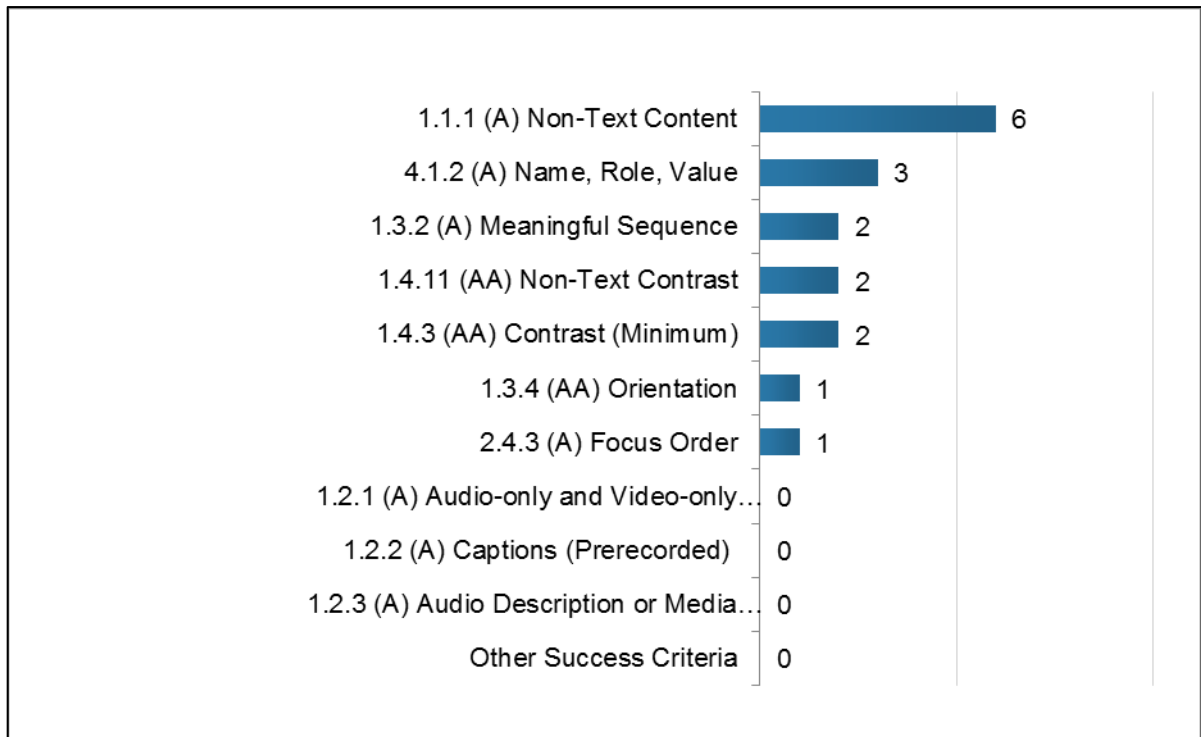
Figure 2.6.4: Top 10 WCAG Issues

Link to accessible table

Accessibility Statement
No Accessibility Statement exists at present.

7. Irish Rail App Android

Key findings

In total, 20 issues were identified across 12 screens (Figure 2.7.1). This equates to a compliance rate of 87% for the WCAG 2.1 SC tested (Figure 2.7.2).
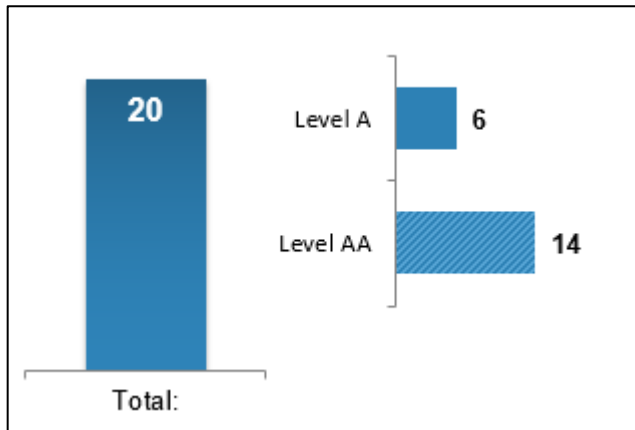
Figure 2.7.1: No. of WCAG Issues
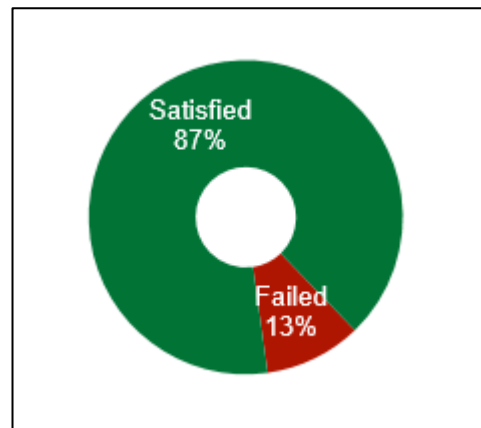
Figure 2.7.2: WCAG Compliance

- 11 issues were related to colour contrast issues. These issues can often be corrected through a change in the style sheet.
- 6 issues were related to text content not appropriately coded as headings or lists.
- 2 issues were related to controls lacking appropriate descriptive labels.
- A project wide issue present is that when the device is rotated the content does not adjust to the new display orientation.

User Impact

The majority of WCAG 2.1 SC failures were classified as having a "Serious" user impact (n=11), with the second highest number classified as "Moderate" (n=9). No "Blocker" issues were identified (Figure 2.7.3).
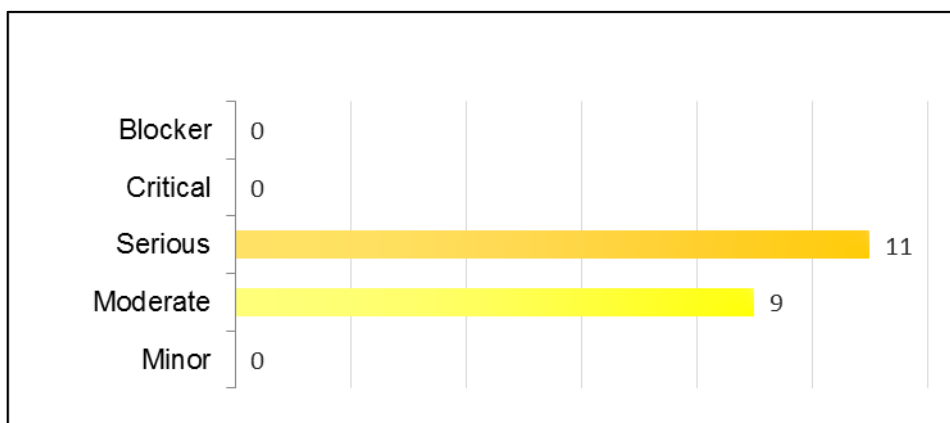
Figure 2.7.3: No. of WCAG errors by User Impact

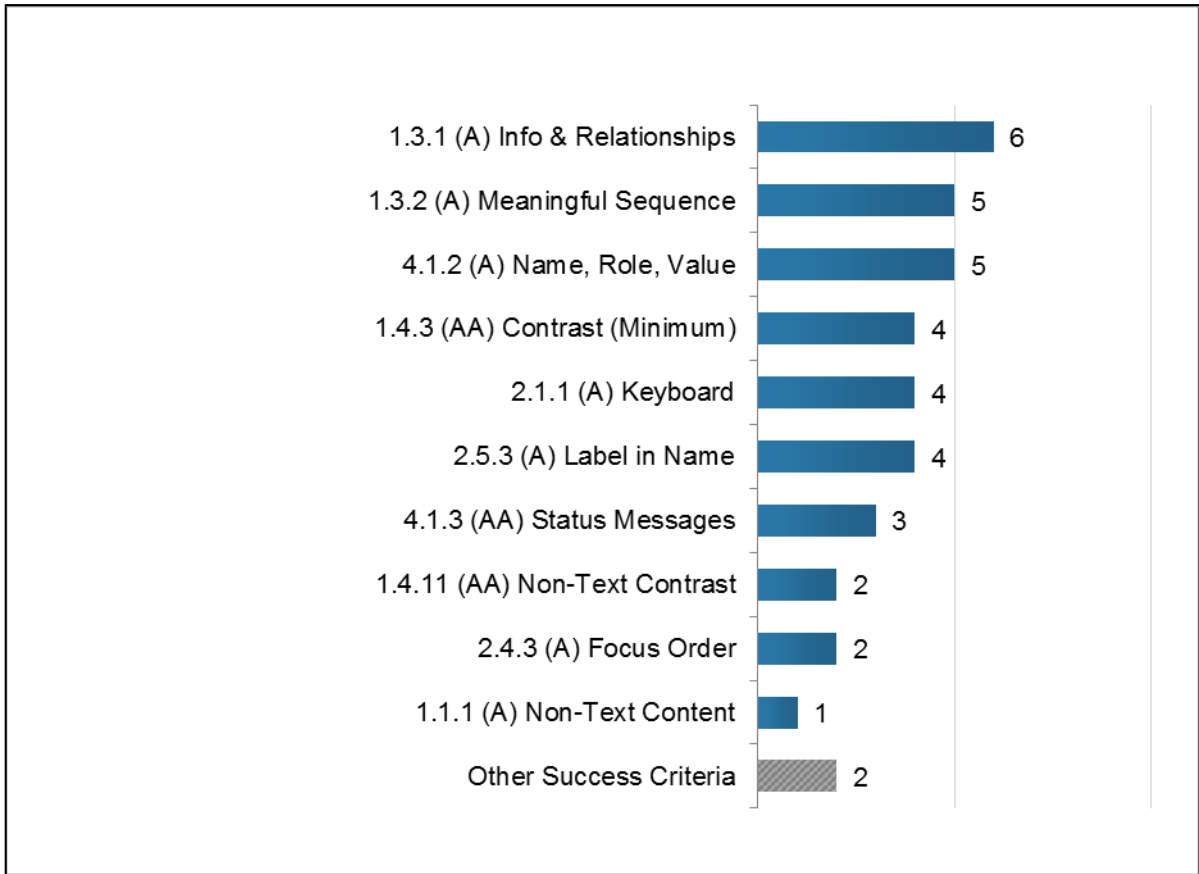The top 10 issues are listed in Figure 2.7.4.
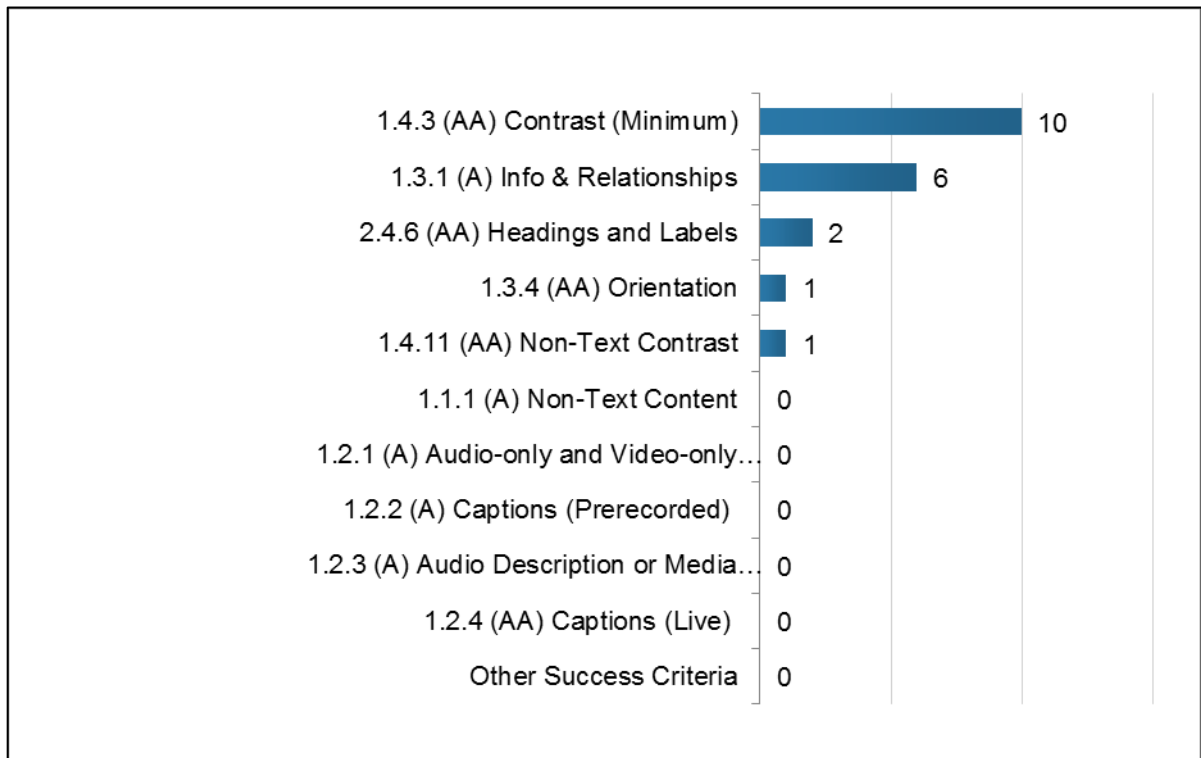
Figure 2.7.4: Top 10 WCAG Issues

[Link to accessible table](#)

Accessibility Statement
No Accessibility Statement exists at present.

8. Irish Rail App iOS

Key findings

In total, 43 issues were identified across 11 screens (Figure 2.8.1). This equates to a compliance rate of 67% for the WCAG 2.1 SC tested (Figure 2.8.2).
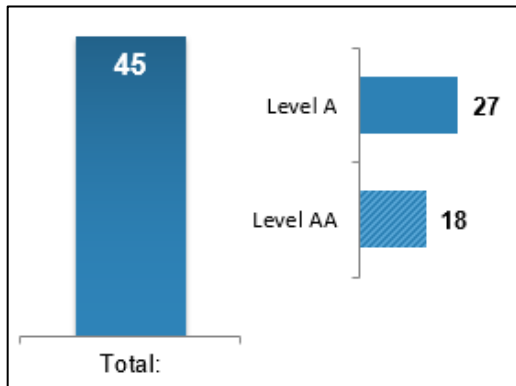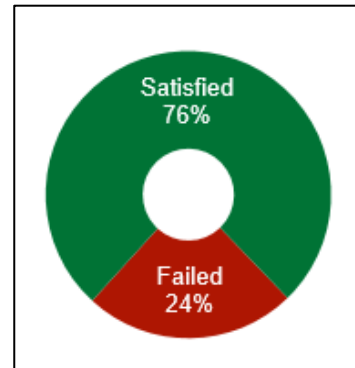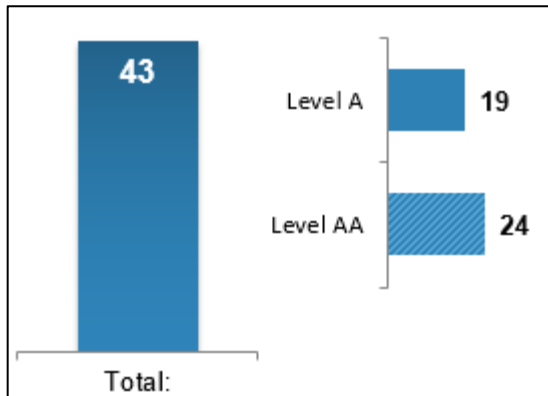

Figure 2.8.1: No. of WCAG Issues
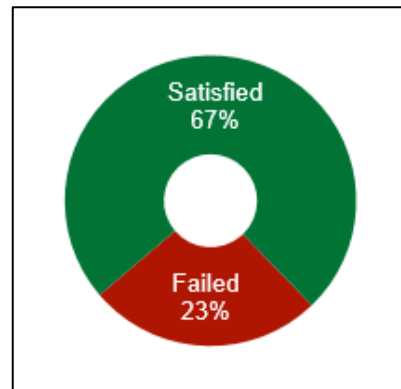
Figure 2.8.2: WCAG Compliance

- 18 issues were related to colour contrast issues. These issues can often be corrected through a change in the style sheet.
- 4 issues were related to text content not appropriately coded as headings.
- 4 issues were related to screen reader and/or voice control users unable to perform basic actions central to the functionality of the android app.
- 4 issues were relating to controls lacking an accessible name, role or value.

User Impact

The majority of WCAG 2.1 SC failures were classified as having a "Serious" user impact (n=31), with the second highest number classified as "Moderate" (n=7). No "Blocker" issues were identified (Figure 2.8.3).
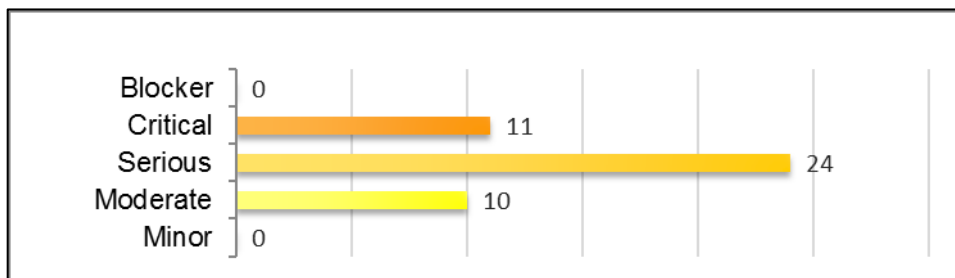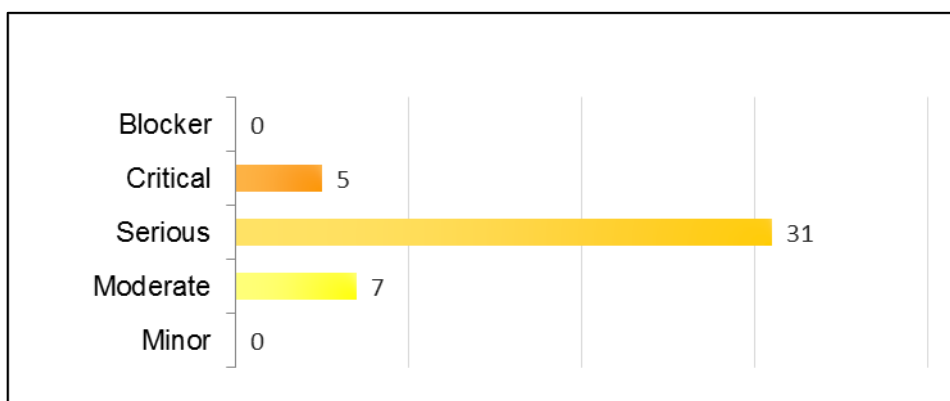

Figure 2.8.3: No. of WCAG errors by User Impact
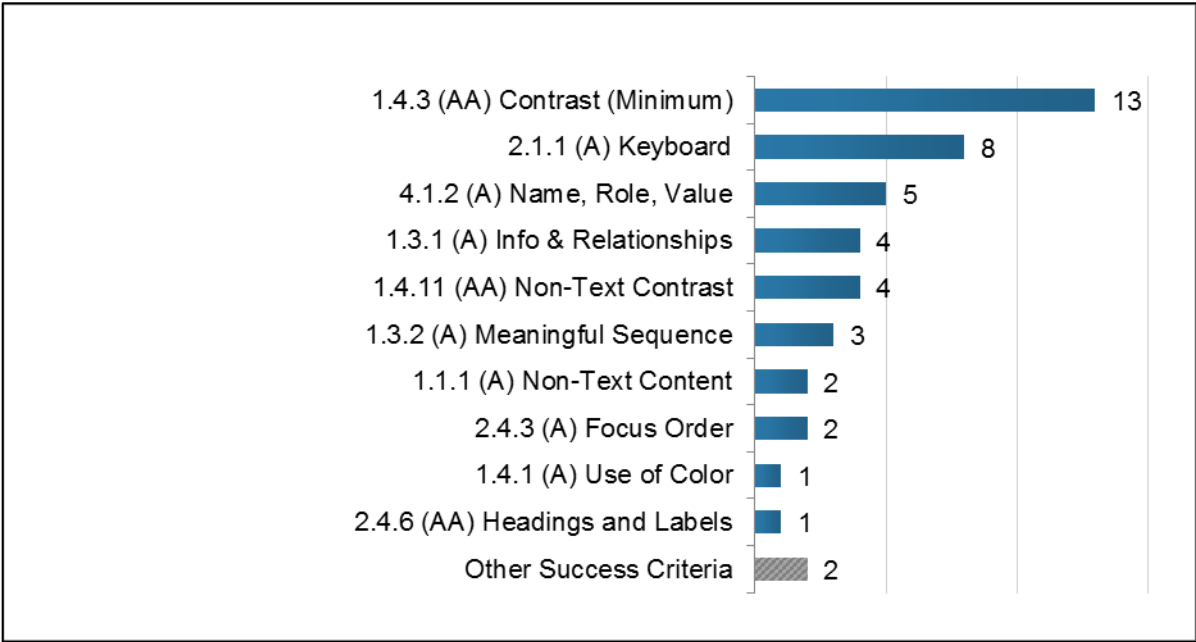
The top 10 issues are listed in Figure 2.8.4.
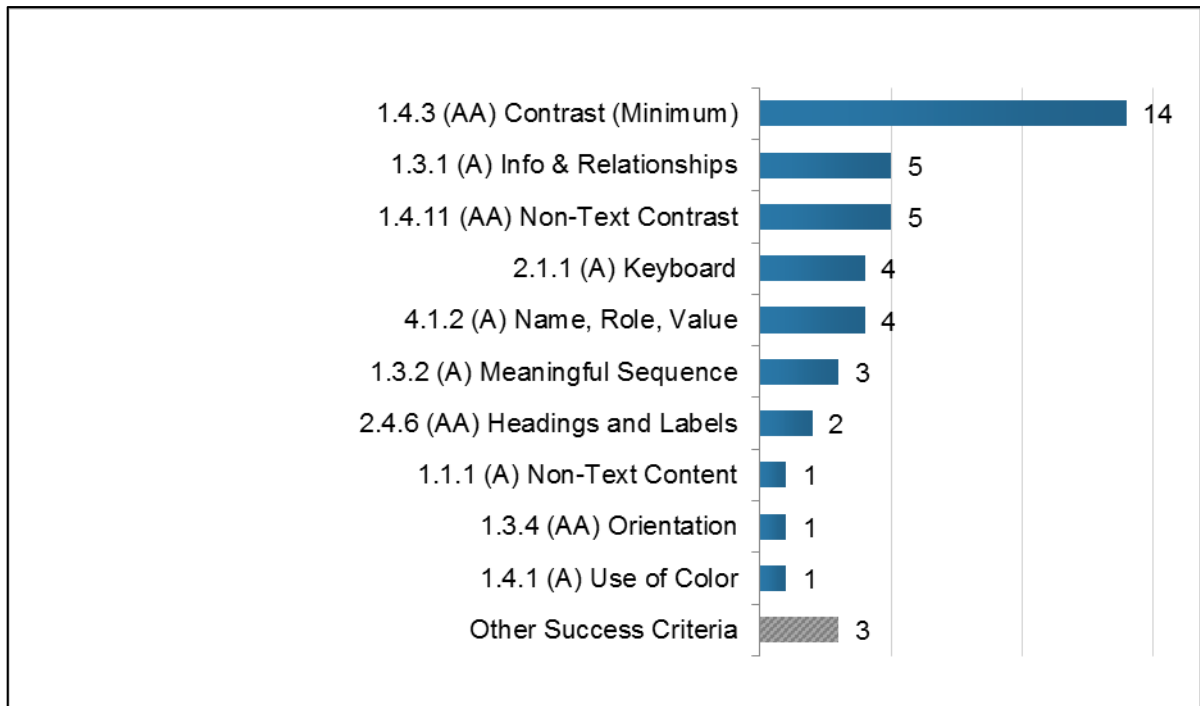
Figure 2.8.4: Top 10 WCAG Issues

[Link to accessible table](#)

Accessibility Statement
No Accessibility Statement exists at present.

9. Leap Top-up App Android

Key findings

In total, 6 issues were identified across 7 screens (Figure 2.9.1). This equates to a compliance rate of 87% for the WCAG 2.1 SC tested (Figure 2.9.2).
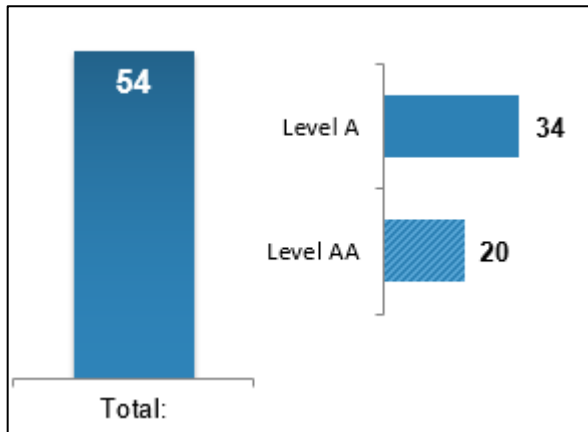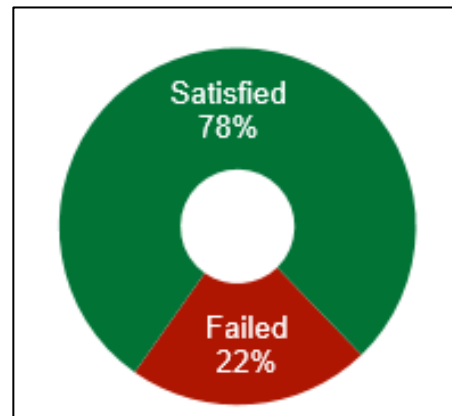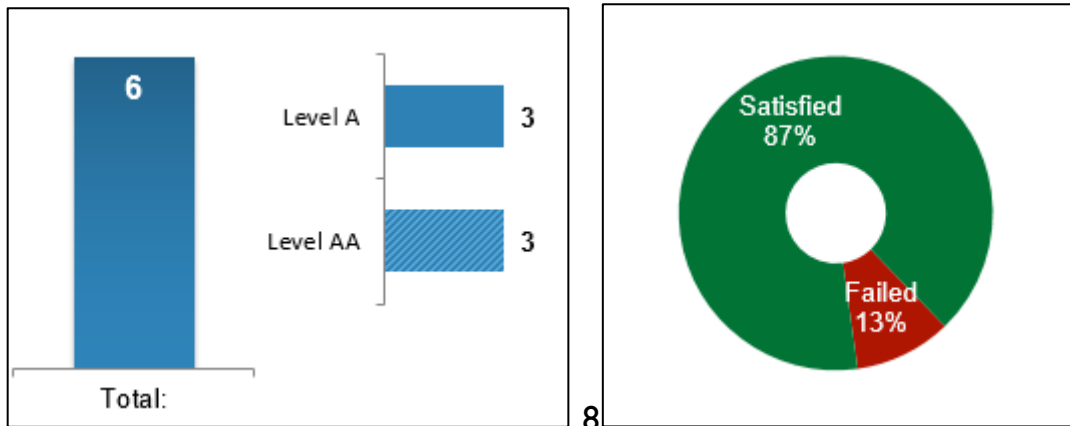

Figure 2.9.1: No. of WCAG Issues5

Figure 2.9.2: WCAG Compliance

- 2 issues were related to colour contrast on a graphical object. These issues can often be corrected through a change in the style sheet.

User Impact

The majority of WCAG 2.1 SC failures were classified as having a "Serious" user impact (n=4), with the second highest number classified as "Critical" (n=2). No "Blocker" issues were identified (Figure 2.9.3).
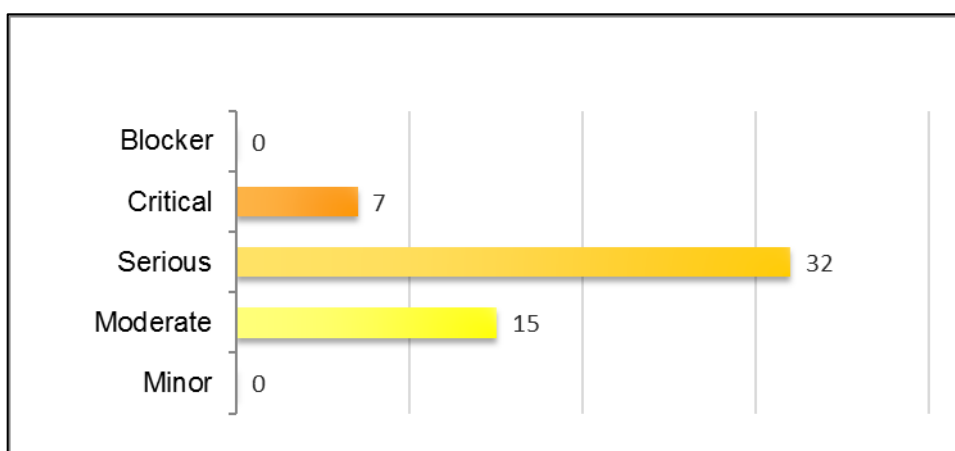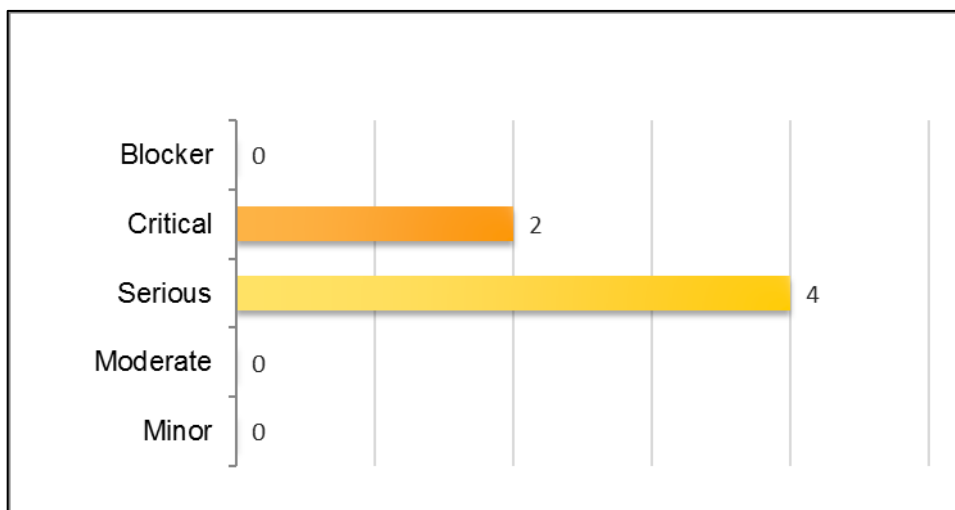

Figure 2.9.3: No. of WCAG errors by User Impact

The top 10 issues are listed in Figure 2.9.4.
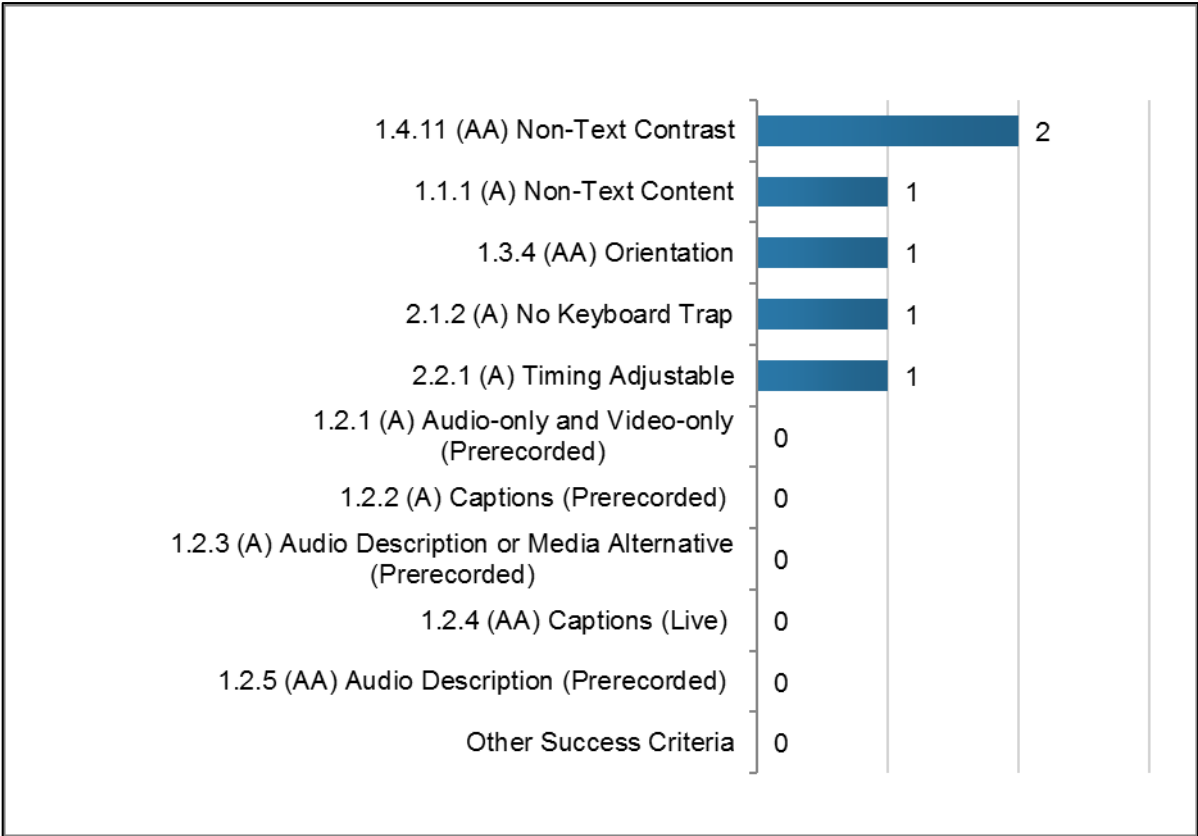
Figure 2.9.4: Top 10 WCAG Issues

Link to accessible table

Accessibility Statement

The Accessibility Statement on the website states it is committed to making the Leap Top- up app accessible.

10. Real Time Ireland App Android

Key findings

In total, 46 issues were identified across 9 screens (Figure 2.10.1). This equates to a compliance rate of 66% for the WCAG 2.1 SC tested (Figure 2.10.2).
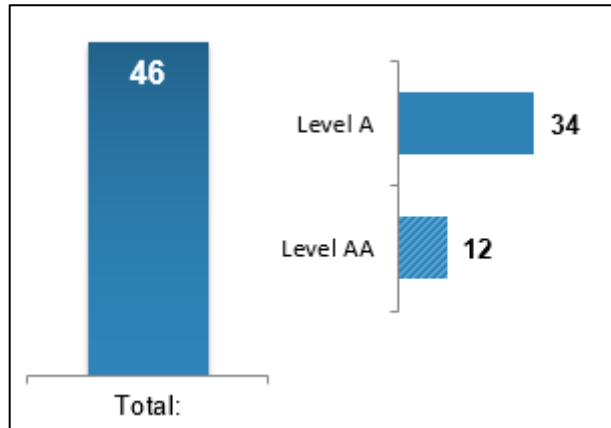
Figure 2.10.1: No. of WCAG Issues
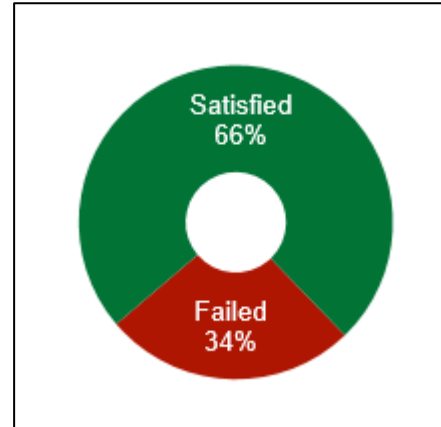
Figure 2.10.2: WCAG Compliance

- 8 issues were related to colour contrast issues. These issues can often be corrected through a change in the style sheet.
- 9 issues were relating to controls lacking an accessible name, role or value.
- 11 issues were related to screen reader and/or switch control users unable to perform basic actions central to the functionality of the android app.

User Impact

The majority of WCAG 2.1 SC failures were classified as having a "Serious" user impact (n=25), with the second highest number classified as "Critical" (n=16). No "Blocker" issues were identified (Figure 2.10.3).
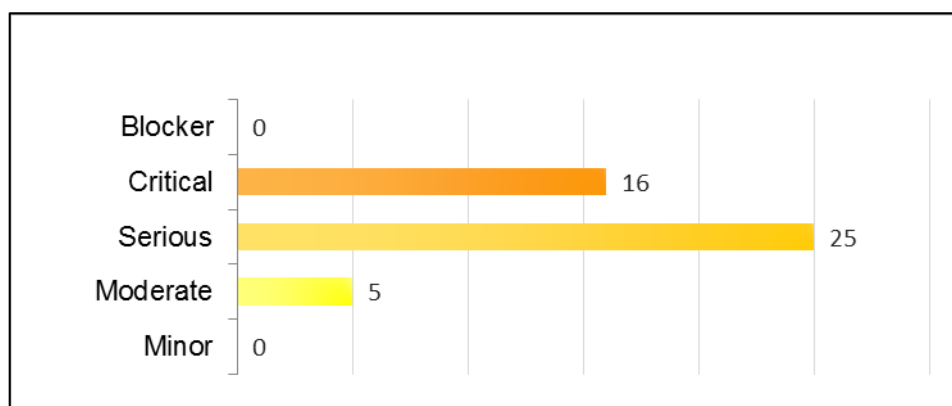
Figure 2.10.3: No. of WCAG errors by User Impact
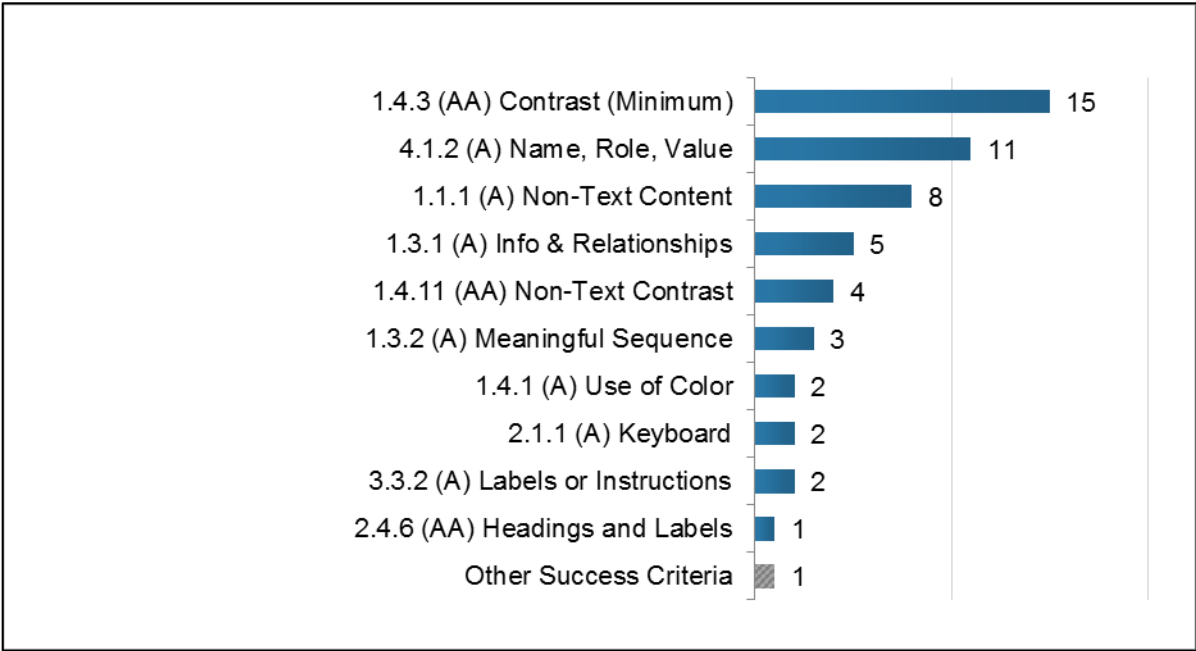
The top 10 issues are listed in Figure 2.10.4.
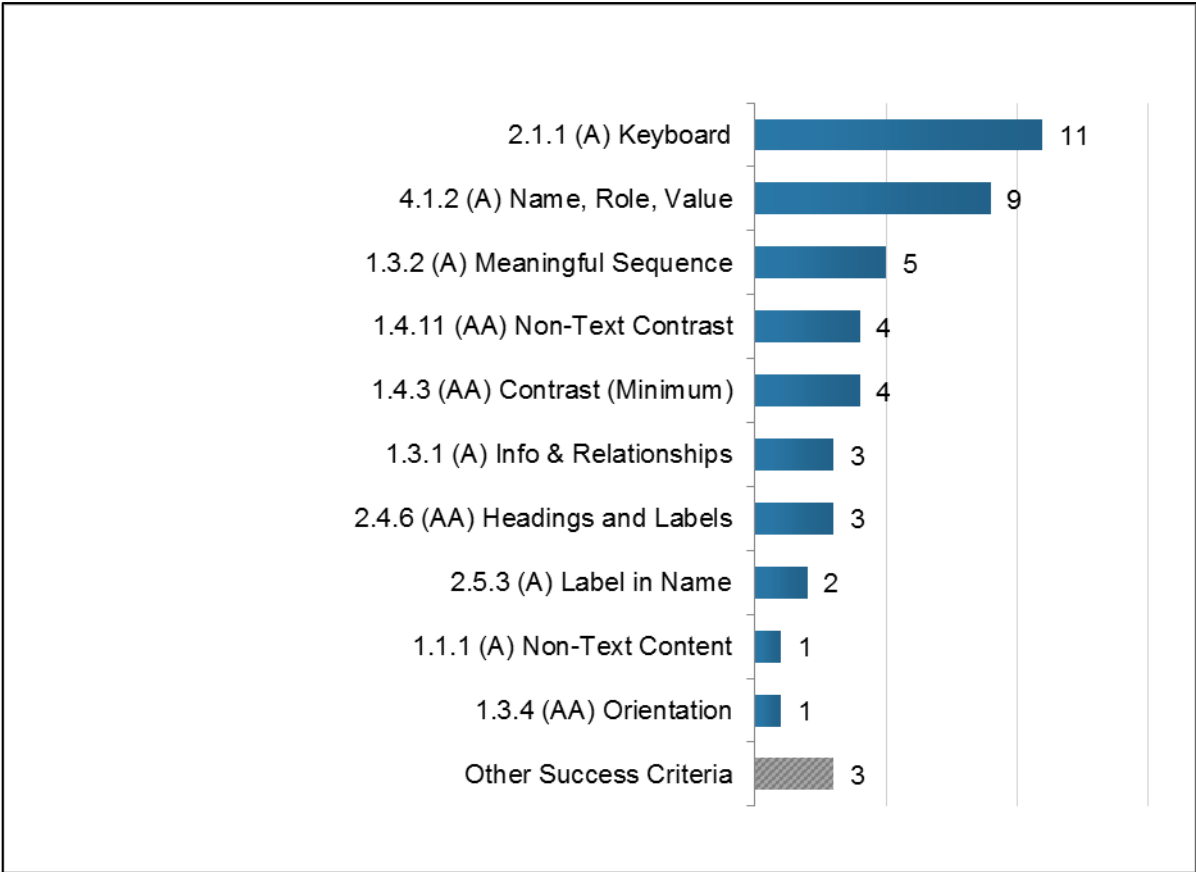
Figure 2.10.4: Top 10 WCAG Issues

Link to accessible table

Accessibility Statement

No accessibility statement present.

11. Real Time Ireland App iOS

Key findings

In total, 45 issues were identified across 9 screens (Figure 2.11.1). This equates to a compliance rate of 70% for the WCAG 2.1 SC tested (Figure 2.11.2).
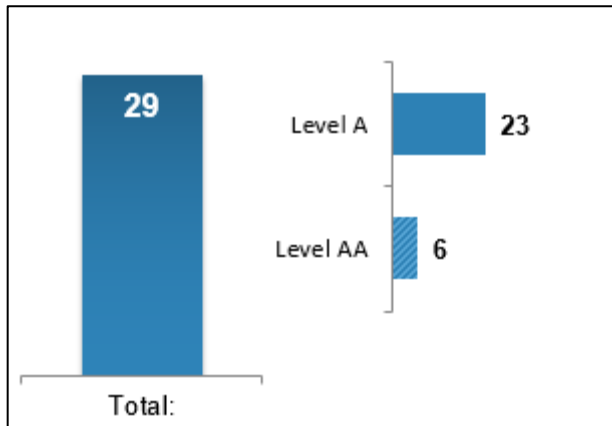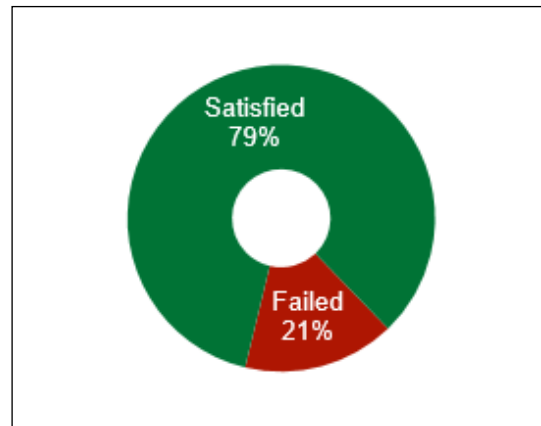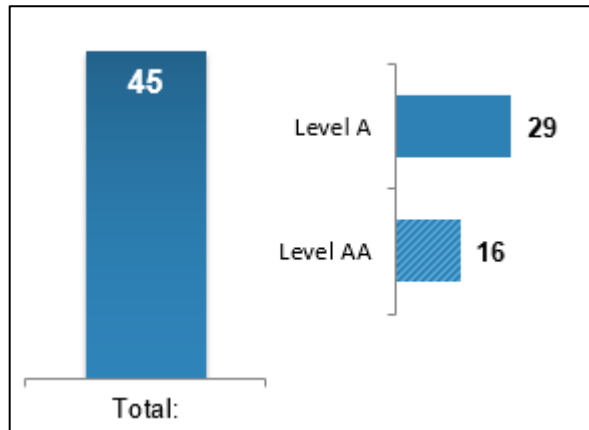

Figure 2.11.1: No. of WCAG Issues
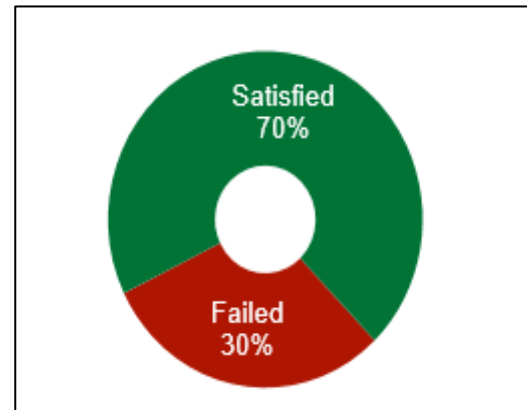
Figure 11.2: WCAG Compliance

- 10 issues were related to colour contrast issues. These issues can often be corrected through a change in the style sheet.
- 7 issues were relating to controls lacking an accessible name, role or value.
- 5 issues were related to images either lacking alternative text or not being appropriately hidden to screen readers if the images were decorative.

User Impact

The majority of WCAG 2.1 SC failures were classified as having a "Serious" user impact (n=31), with the second highest number classified as "Critical" (n=11). No "Blocker" issues were identified (Figure 2.11.3).
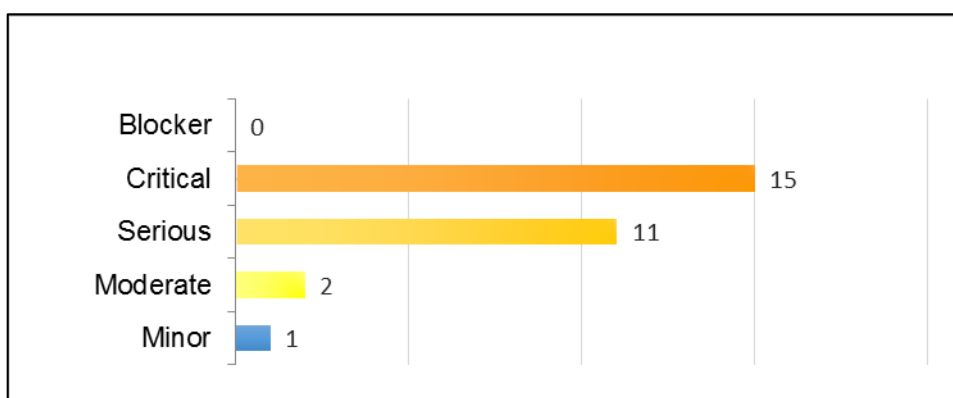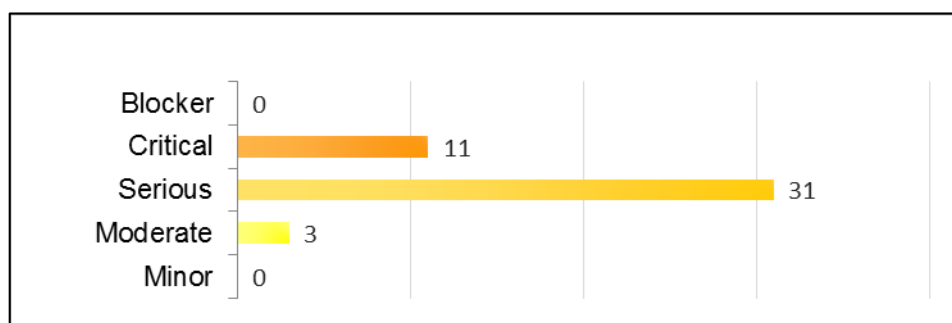

Figure 2.11.3: No. of WCAG errors by User Impact
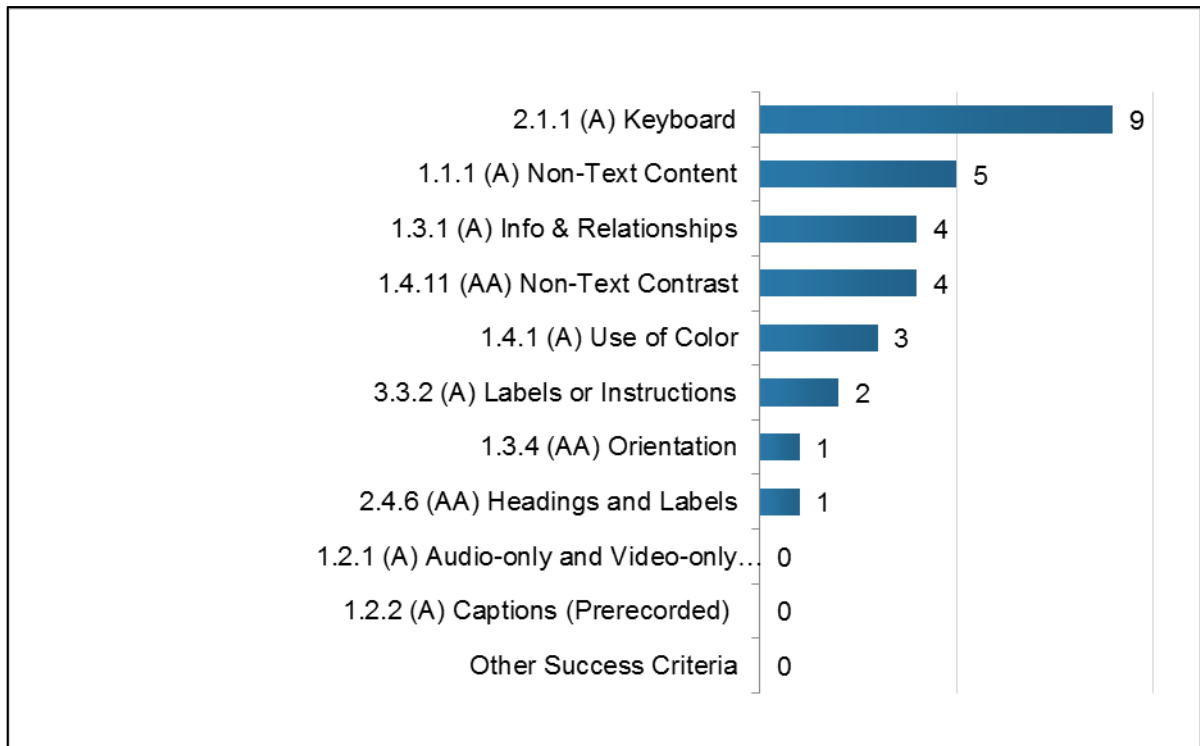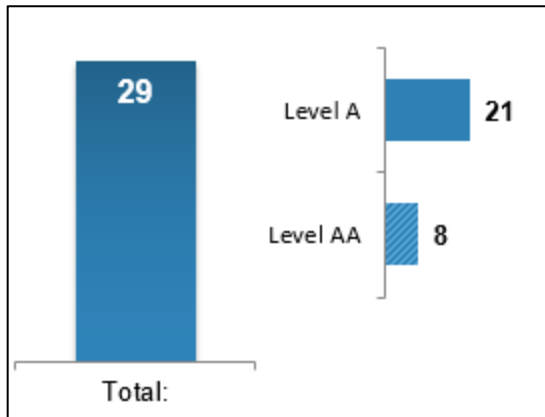
The top 10 issues are listed in Figure 2.11.4.
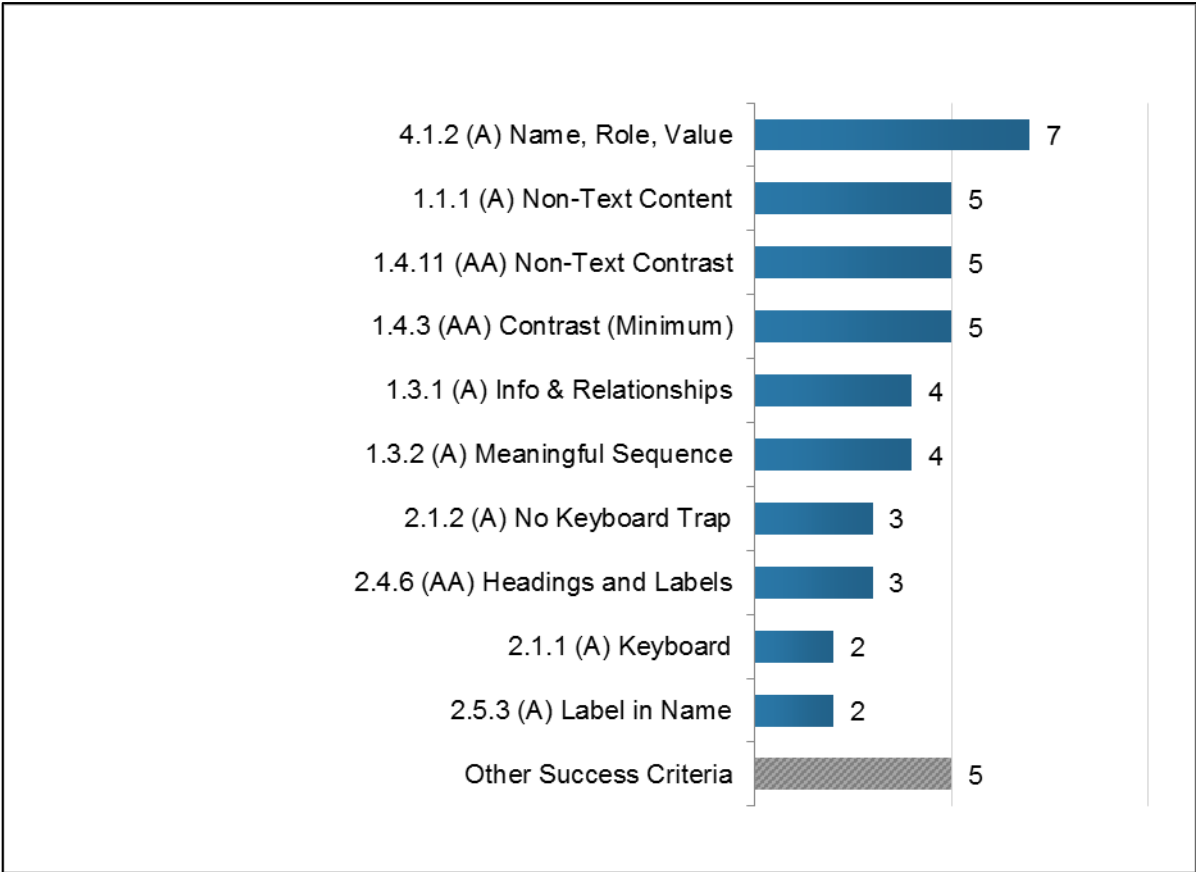
Figure 2.11.4: Top 10 WCAG Issues

[Link to accessible table](#)

Accessibility Statement
No accessibility statement present.

3. Simplified reviews

Simplified Reviews use automated testing to test a sub-set of WCAG 2.1 Success Criteria across a sample of up to 400 pages per site. Simplified Reviews cannot confirm compliance but can confirm instances of non-compliance. Simplified Review data provided by NDA gives public bodies subject to monitoring a baseline understanding of their website's accessibility health and enables them to understand key trends through larger data samples. This in turn enables the public body to direct resources to address priority issues and to continuously measure issues and the accessibility of improvements.

All public bodies subject to Simplified Review in 2022 received a "Notice of Monitoring" from NDA between July and November 2022. Scans were conducted weekly and NDA provided public bodies access to their Simplified Review data in addition to advice on how to address issues through NDA's dedicated Monitoring and Reporting Platform.[30]

The tool NDA used to conduct Simplified Reviews for the 2022 monitoring period is based on the open source Axe testing engine.[31] The Axe-core testing engine purports to detect up to 57% of errors with WCAG 2.1 AA Success Criteria.

Explanation of monitoring data for Simplified Reviews

Compliance versus Accessibility Score

NDA provides an Accessibility Score for Simplified Review based on the number of pages containing issues that are classified as having a critical, serious or moderate impact on users.[32] A website's Accessibility Score increases with fewer errors. A site with no errors detected will achieve a score of 100%, sites with at least one critical error on each page will achieve a score of zero.

Full compliance with WCAG 2.1 AA is achieved when ALL success criteria are met. Therefore an Accessibility Score of 100% does not equate to full compliance with WCAG 2.1 AA.

> NDA recommends public bodies use their Simplified Review's Accessibility Score as a high level indicator of the accessibility 'health' of their website. It should never be viewed as a measure of a site's compliance with WCAG 2.1 AA.

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[30] http://euwad.nda.ie

[31] Axe is an accessibility testing engine for websites and other HTML-based user interfaces. https://github.com/dequelabs/axe-core

[32] See Annex 2.1 for the formula used to calculate a site's Accessibility Score

A website's Accessibility Score will fluctuate over time for a number of reasons including:

- scans picking up new pages,
- changes made to the site by the public body
- new content being published to the site, and
- improvements to the Axe testing engine resulting in new issues being detected and recorded.

NDA advises public bodies that an Accessibility Score does not reflects a sites compliance with the EU WAD

While the Directive and its Implementing Decisions do not require such a scoring, it is used in this report as a high level indicator of the accessibility 'health' of the website, and this information is provided to the public bodies in question. It is also intended to motivate public bodies to improve their Accessibility Score over time by addressing the most critical and serious issues first and seeing tangible improvements in the Accessibility Score.

> NDA recommends public bodies confirm their compliance through conducting or commissioning a **full accessibility review** of their site, to include manual and automated testing.

Simplified reviews results

NDA conducted Simplified Reviews on 230 websites. More than half of these sites differed from the sites subject to Simplified Review for the 2021 monitoring period. The monitoring results presented here are based on a snap shot of data taken on 30th March 2023. The maximum number of pages that could potentially be scanned was reduced to 400 pages per site in the 2022 monitoring period, in comparison to 1,000 in the 2021 monitoring period.

An average of 253 pages were tested per site. The average number of errors identified per site was 3,896. Overall, 24.2% of pages were found to have errors. This is slightly up on 22.2% from the average number of errors found in the 2021 monitoring period. Table 3 provides further details on the number of errors

Table 3: Number and types of error per site

Pages and types of error	Errors
AVG pages tested	253
% of pages with no errors	24.2%
AVG errors per site	3,896

Pages and types of error	Errors
AVG critical errors per site	480
AVG serious errors per site	2,712
AVG moderate errors per site	2
AVG minor errors per site	703
AVG errors per page	18
AVG Accessibility Score	30.6%

User impact

The majority of errors identified (2,712) were classified as "Serious". While a relatively small number of Minor errors (703) were identified, the number of Critical errors (406) was lower (Figure 3.1). This compares favourably with the 2021 monitoring period, were the number of critical errors was greater than the number of minor errors (2,396 versus 1,930) This may be the result of some public bodies subject to monitoring across both periods following NDA's advice to focus on removing critical errors first. Critical errors prevent some users with disabilities from accessing certain parts of the content, potentially rendering it unusable and all public bodies should address critical errors as a matter of priority.
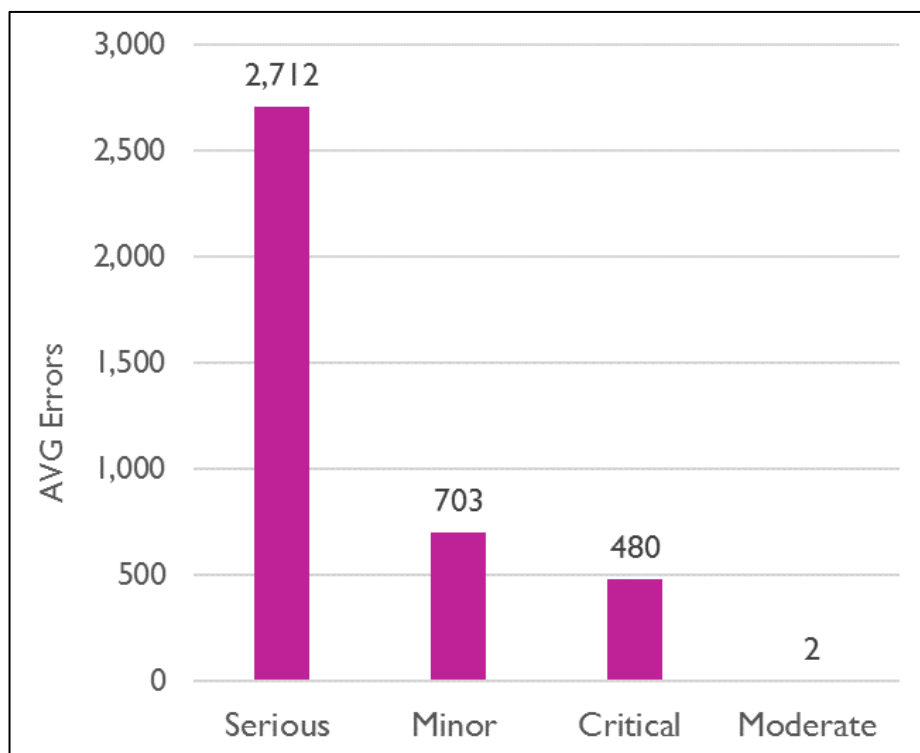
Figure 3.1: Average errors by severity level – all websites

Types of errors

For the second monitoring period in a row, the most common error identified on the majority of sites (100) related to colour contrast (Figure 3.2).

PDFs account for the highest number of errors for 68 websites.

The error "Name Role Value" is frequently associated with how interactive elements are coded on pages such as search forms, application forms, cookie banners and other interactive widgets. Similarly, parsing is associated with how pages are coded, and if HTML is coded correctly. Both these category of errors accounted for the most frequent errors found on 19 and 13 websites respectively.
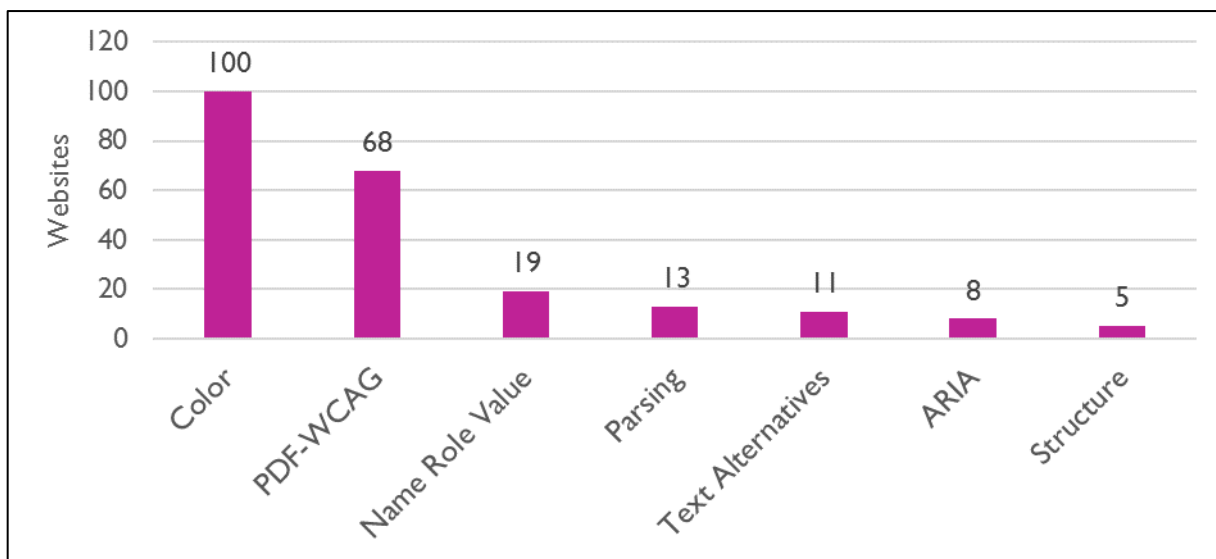
Figure 3.2: WCAG 2.1 Success Criteria with most issues found – all sites

Average errors per page

For the second monitoring period in succession, a large majority of websites reviewed (139) contained either seven or more errors per page on average (Figure 3.3).

Secondary analysis by NDA reviewers confirmed that many of the errors identified were the same error repeated either multiple times on the same page or the same errors occurring across multiple pages. For some categories of errors, repairing an error in the CSS file or in the HTML of the website's template can result in numerous errors being addressed. The drop in the number of errors identified for some cohorts of websites, such as the Local Authority sector, may be partially accounted for by these bodies identifying and addressing these types of errors (see section on Local Authorities).
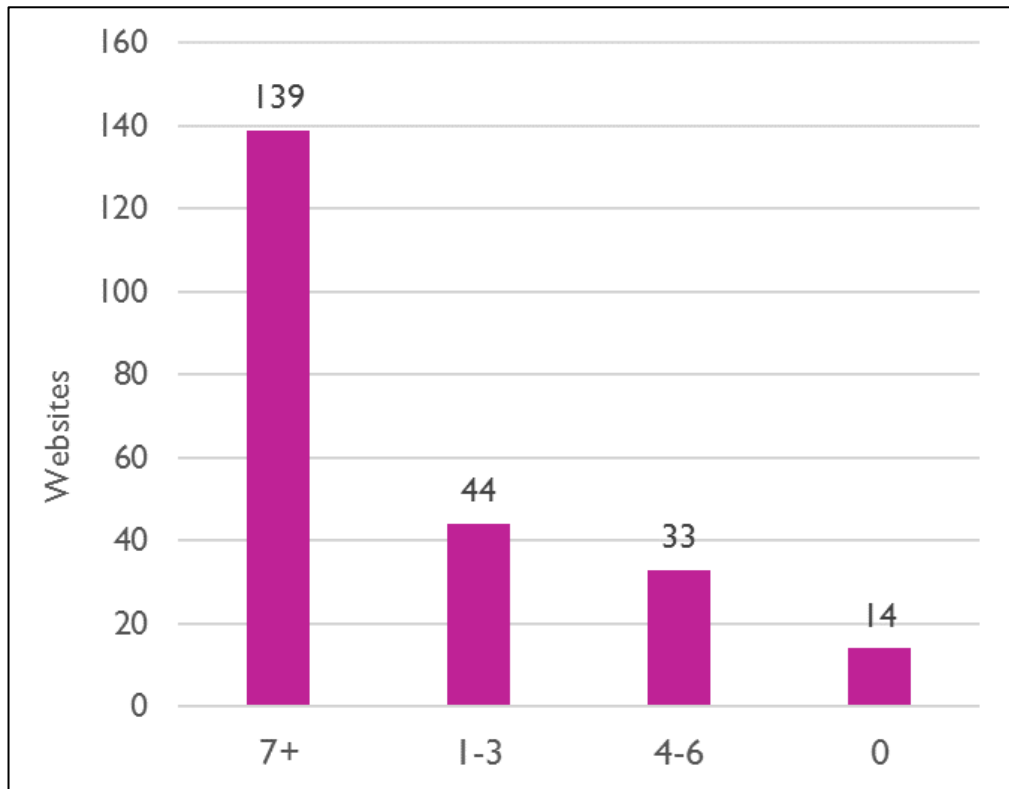
Figure 3.3: Average errors per page – all websites

Accessibility scores

Only 8.2% of websites attained an Accessibility Score of 90% or higher, a slight increase from the 2021 monitoring period (7.5%). In contrast, 38.6% of websites had an Accessibility Score of 10% or less, also representing an increase from the monitoring period 2021 (28%).

The following section shows monitoring data specific to the following priority sectors:

- PDFs published by Government departments on GOV.ie
- Local Authorities
- Transport Service Providers
- Higher education institutions

1. PDFs published by Government departments on GOV.ie

As per previous monitoring reports, the accessibility of PDFs is the second largest issue identified during Simplified Reviews. The majority of Government Departments' web presence is on GOV.ie, managed by the Office of the Government Chief Information Officer (OGCIO). Government Departments routinely publish PDFs to GOV.ie but do not have responsibility for or access to the source code of the HTML for this site, which is managed by OGCIO. While the HTML pages on GOV.ie demonstrate a high level of compliance with the Directive, the PDFs it hosts are largely inaccessible.

NDA conducted a review of the top ten most frequently accessed PDFs for each Department on GOV.ie.[33]

A total of 8,404 errors were detected for the 170 PDFs reviewed, resulting in an average of 49.4 errors per PDF. The highest number of issues detected was 1,482 on the Department of Environment Climate and Communications PDFs. The lowest number of issues detected was 72 for the department of Social Protection PDFs. Figure 3.1.1 presents details by department.

Figure 3.1.1: Average errors per site – PDF's published by government departments

See accessible table in Annex 5

Applying the Accessibility Score to each Department's PDFs shows an average score of 3.3%. This compares to 30.6 as the average Accessibility Score for all sites subject to review, and an Accessibility Score of 95.7% for the HTML-only pages for the GOV.ie website, managed by the OGCIO. Details of the accessibility scores for individual departments are presented in Figure 3.1.2.

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[33] Data provided by the Office of Government Chief Information Officer
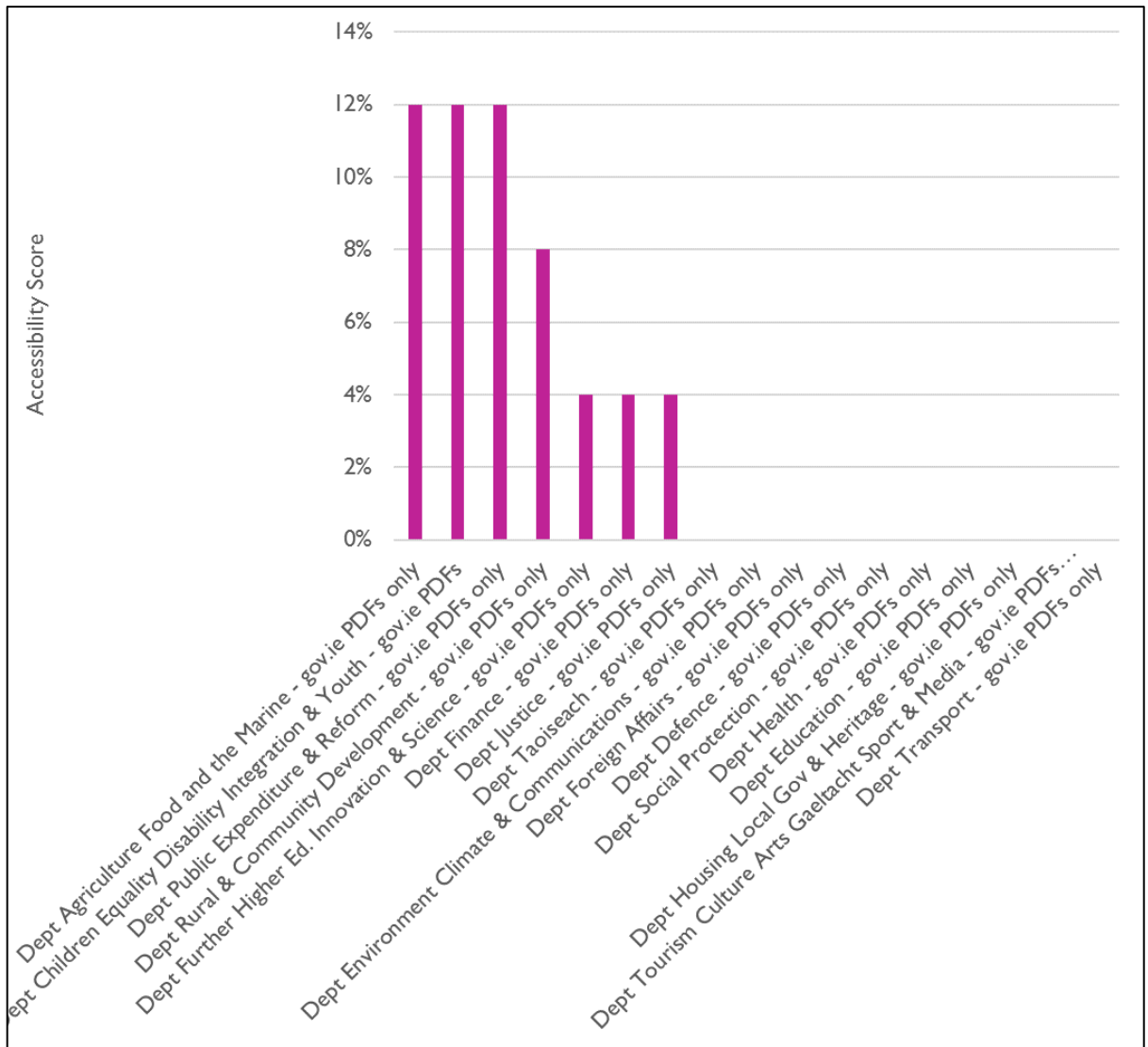
Figure 3.1.2: Accessibility Scores by Department

See accessible table in Annex 5

2. Local Authorities

NDA conducted Simplified Reviews on the main websites of 30 Local Authorities. [34]

Errors and user impact

The average number of errors on the 30 Local Authority websites was nearly twice that of all other websites reviewed (6,991 versus 3,896) Figure 3.21. However, the average Accessibility Score for Local Authorities (36.6%) is slightly higher than for all sites (30.6%) Figure 3.2.2.
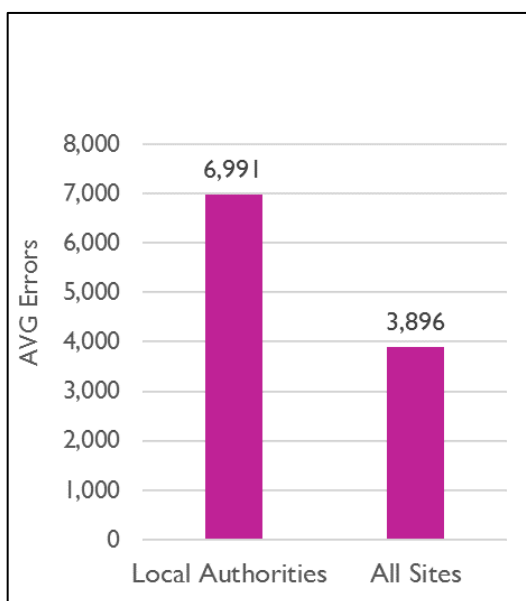
Figure 3.2.1: Average number of errors
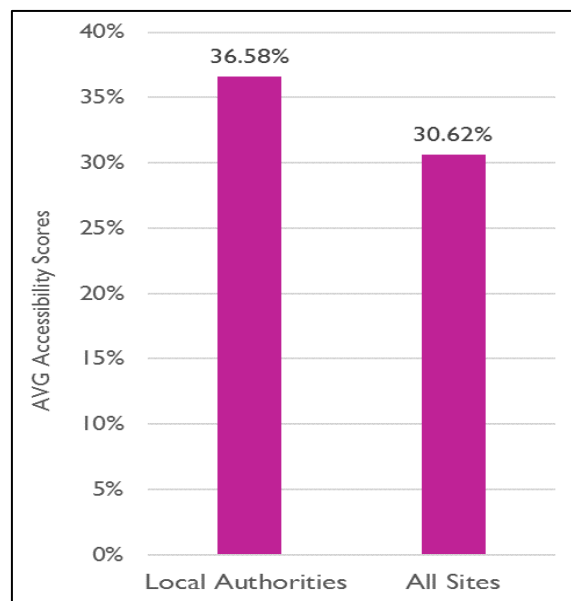
Figure 3.2.2: Average Accessibility Scores

Types of errors – Local Authorities

The most common errors identified on Local Authority websites are broadly similar to those found on all sites, with errors related to Colour Contrast, PDF and "name, role value" accounting for the top three errors as outlined in Figure 3.2.3.

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[34] Leitrim Country Council website was not scanned due to security measures in place on that site.
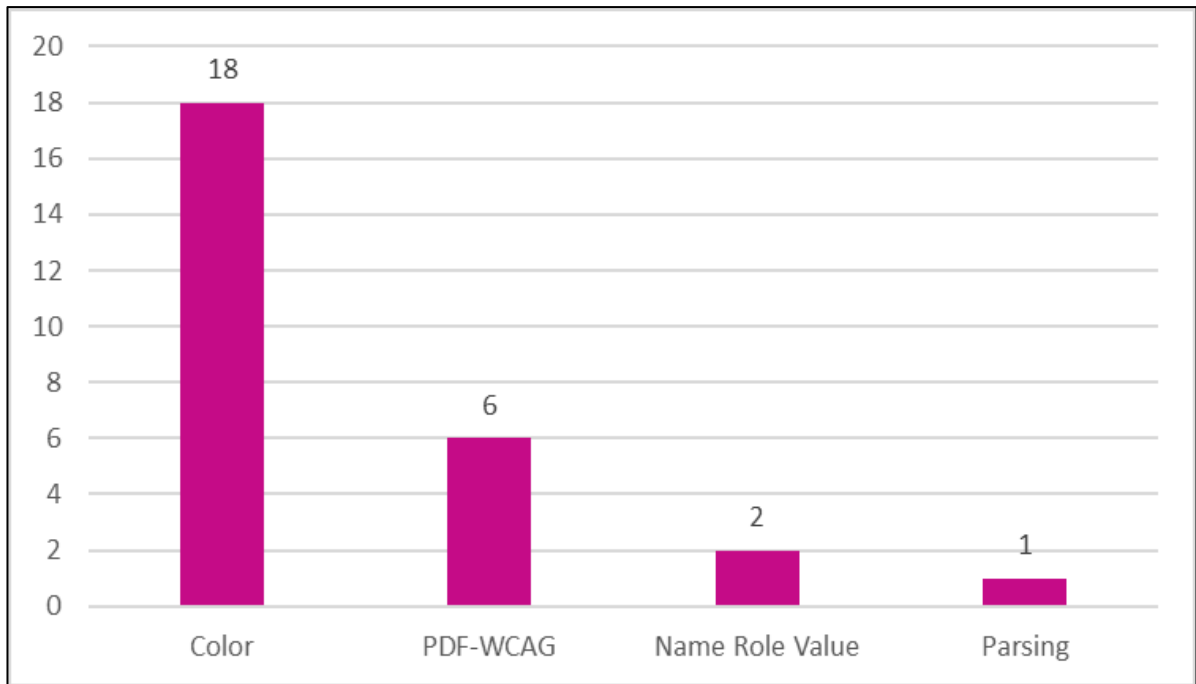
Figure 3.2.3: Frequency of occurrences of main errors – Local Authorities

A small number of Local Authorities have indicated to NDA that they have web development projects planned for 2023 and this work will address many of the accessibility issues identified. However, Local Authorities continue to routinely publish content in inaccessible PDFs. While some Local Authorities have addressed many of the accessibility errors identified in their Simplified Review for the HTLM pages on their website, the practice of publishing inaccessible PDFs will continue to be a challenge to reaching full compliance with the Directive.

Errors and Accessibility Score per site – Local Authorities

There was a very large variance in the number of errors across all Local Authority websites reviewed. While Wicklow County Council is a clear outlier in terms of the number of errors identified for the second monitoring period in a row, it is useful to consider that large scale automated scanning can capture multiple instances of an error on a page or across hundreds of pages. It is necessary therefore to consider also the impact of these errors on end-users. This is accounted for through the Accessibility Score which assigned a weighting to the seriousness of the user impact for each error. Figure 3.2.4 presents the number of errors per site by local authority area.
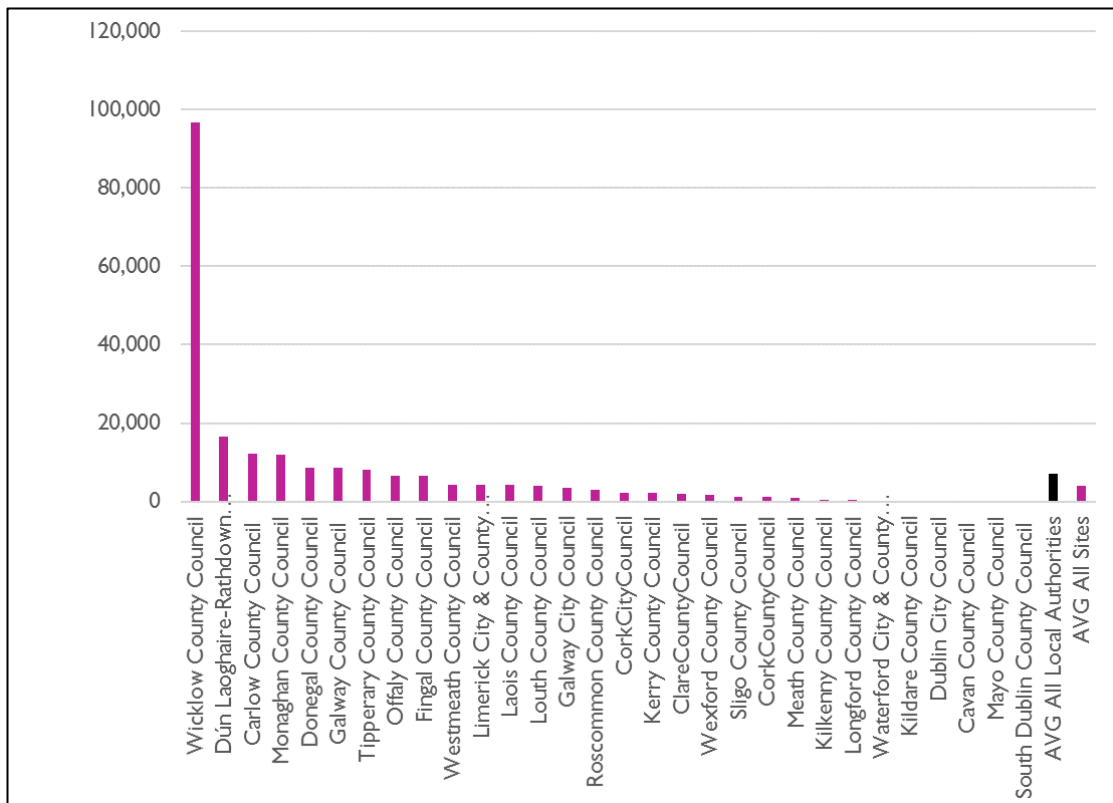
Figure 3.2.4: Total Number of Errors per site – Local Authorities

See accessible table in Annex 5

It is noteworthy that some Local Authorities are using their monitoring data to make significant improvements. Six Local Authorities have achieved an Accessibility of 90% or more, in comparison to four for the 2021 monitoring period. Figure 3.2.5 presents the accessibility score by local authority area. However, overall the number of errors and Accessibility Score of most Local Authorities remains static. NDA recommends that public bodies use their Simplified review data to begin to understand and remediate their website. However, an Accessibility Score does not equal compliance and Local Authorities should conduct a comprehensive accessibility review of their website to plan for and improve its accessibility.
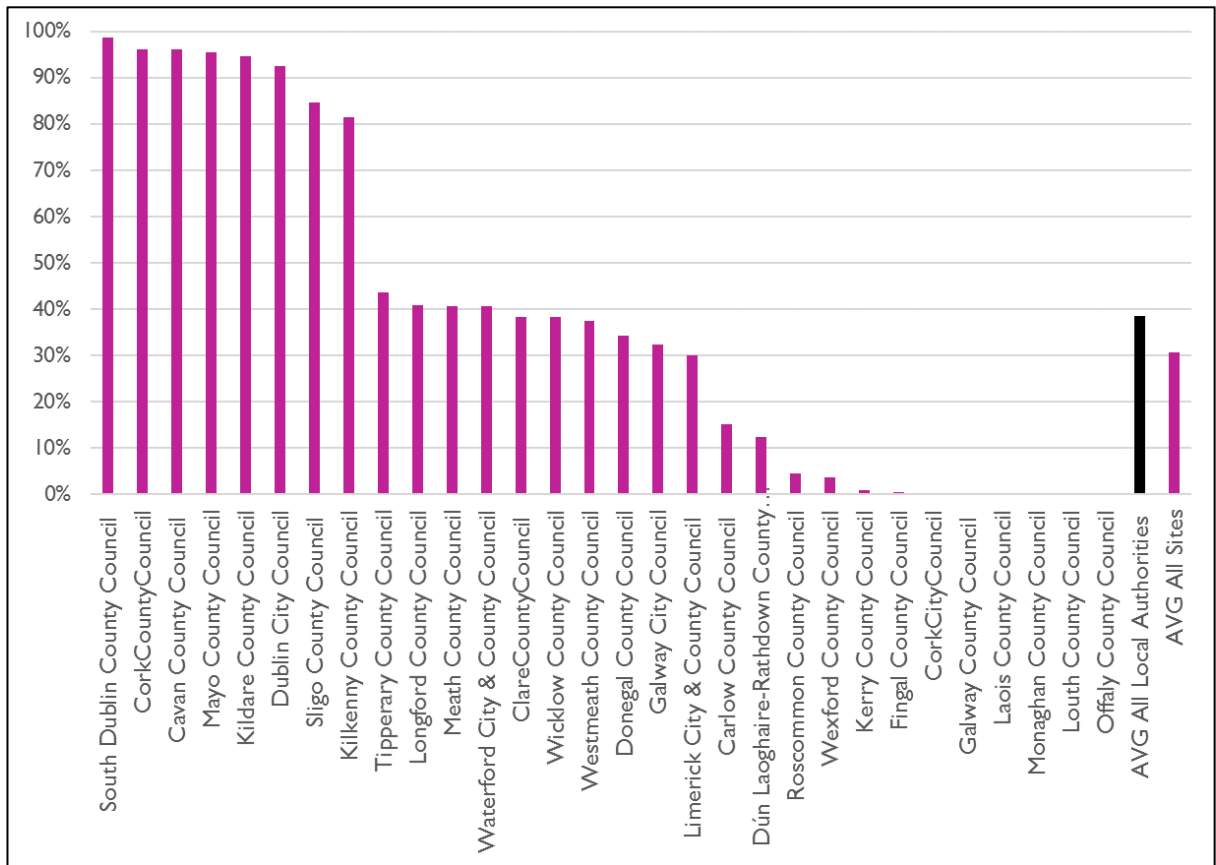
Figure 3.2.5: Average accessibility scores – Local Authorities

See accessible table in Annex 5

3. Transport Service Providers

Transport providers tend to have smaller websites on average but these typically contain a lot of functionality and complex interactions.

Errors and user impact

The average number of errors on the five transport service provider websites was slightly higher than that of All Sites reviewed (Figure 3.3.1). However, the average Accessibility Score for transport providers (16.1%) was low and below the average accessibility score for All Sites (30.6%) (Figure 3.3.2). However, the user impact of the errors identified are more serious in comparison to other websites reviewed.
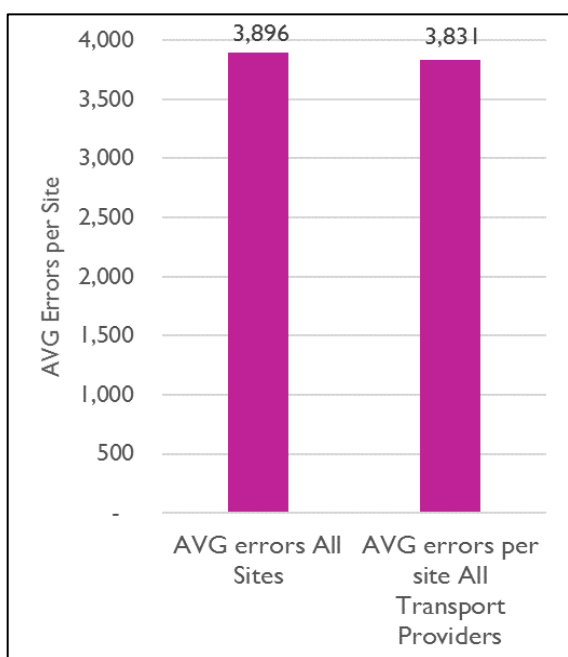
Figure 3.3.1: Average errors per site
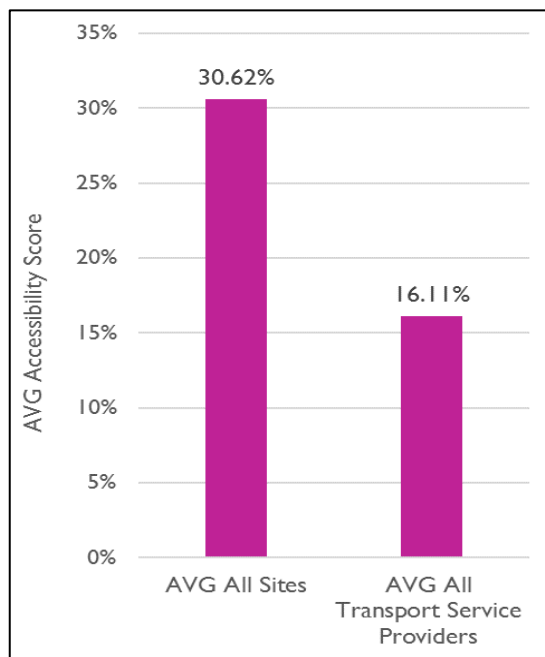
Figure 3.3.2: Average accessibility score

Types of errors - Transport Service Providers

The most common errors identified on transport Service Providers' websites are Colour Contrast, Text Alternatives and ARIA and differ to the top errors identified across All Sites (Figure 3.3.3).[35] The error "Structure" is usually associated with missing headings or other sematic mark-up. Alternative text – a basic accessibility requirement which most sites monitored have addressed. The very high number of Alternative Text errors among this cohort is due mainly to the high rate of failures for this checkpoint on the Dublin Bus website.

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[35] ARIA is a W3C specification that stands for "Accessible Rich Internet Applications." It consists of mark-up that can be added to HTML in order to communicate the roles, states, and properties of user interface elements to assistive technologies (AT).
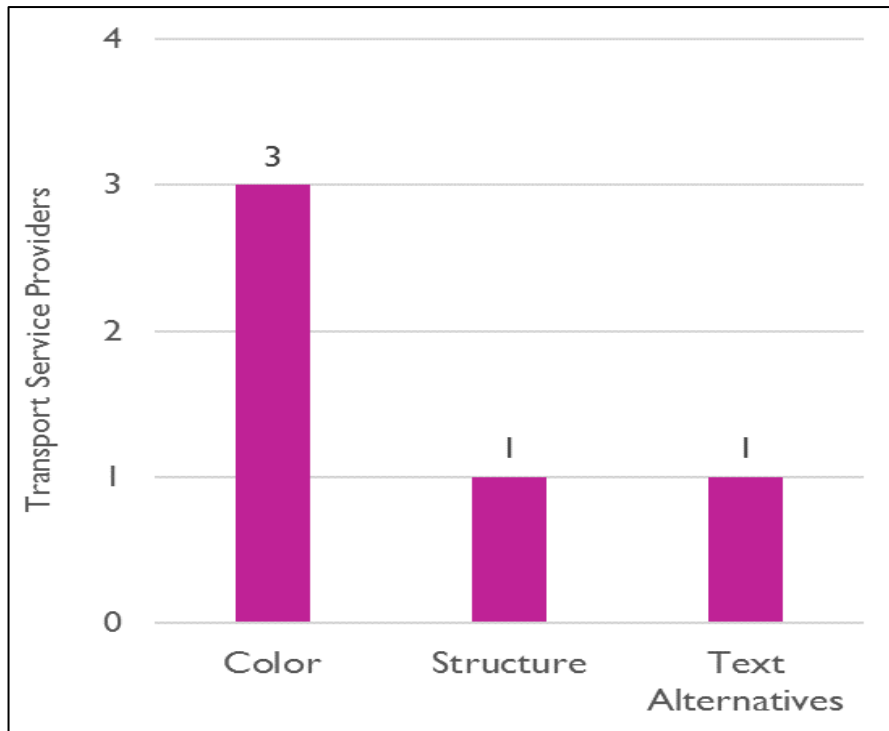
Figure 3.3.3: Frequency of main errors – transport service providers

Errors and Accessibility Scores per site – Transport Service Providers
There was a very large variance in the number of errors across all Transport Service Providers websites. The number of errors on Irish Rail fell significantly for the second monitoring period in a row. While Colour Contrast accounted for a large of errors on three of the sites, errors associated with the design of interactive elements such as journey planners and real-time information have a higher impact on end users, which is reflected in the Accessibility Score. Figure 3.3.4 presents the number of errors per site of transport service providers.
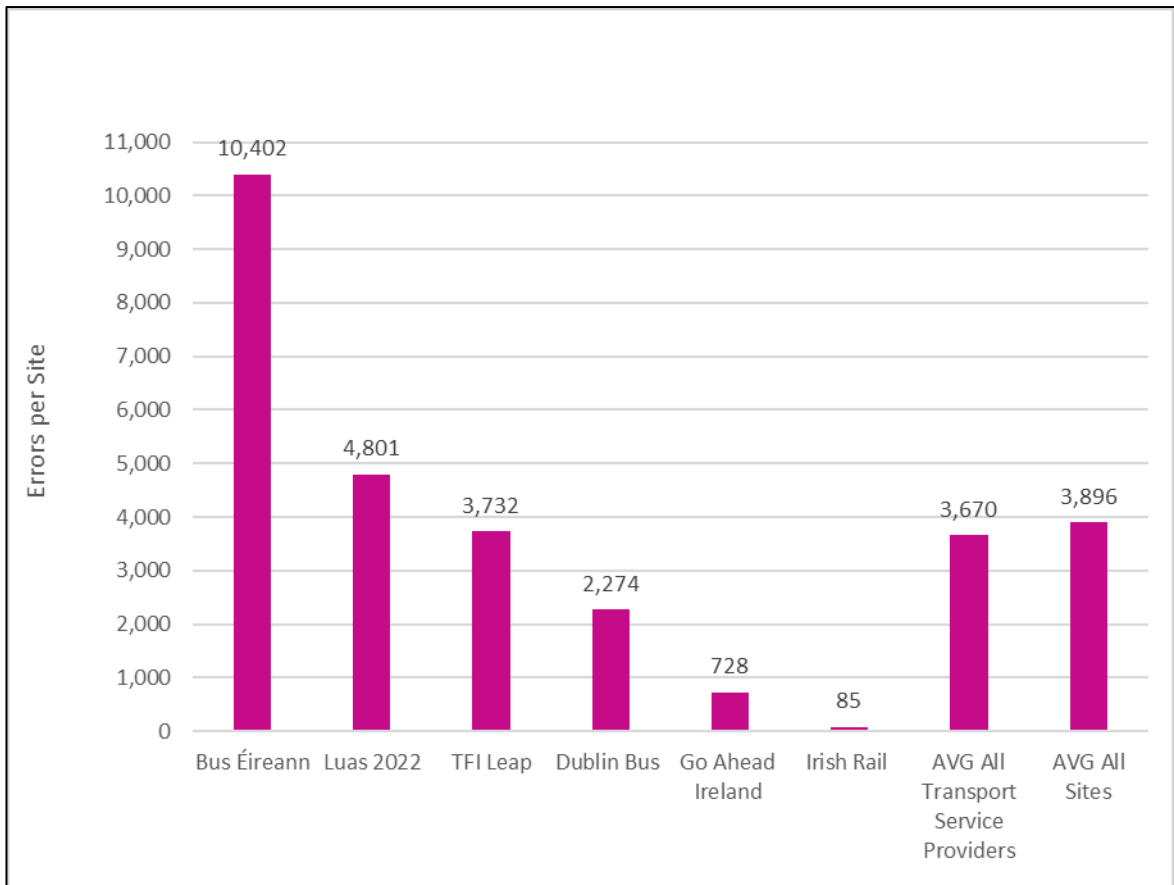
Figure 3.3.4: Total number of errors per site – transport service providers

The very low Accessibility Score of five of the six Transport Service Providers websites reviewed is associated with the large number of errors related to interactive elements on these websites (Figure 3.3.5). Many of these are Critical errors as they can block a user of Assistive Technology or a keyboard-only user completing a task.

Irish Rail's Accessibility Score reflects its efforts to consistently remove errors that can be detected automatically and to its monitoring data to improve compliance.

Simplified Reviews can identify instances of errors, the combination of these errors on an interactive element can render that functionality unusable by some people. NDA recommends that for highly interactive websites such as transport websites that user testing is conducted with a variety of users to better understand the exact impact of these errors and inform their remediation.
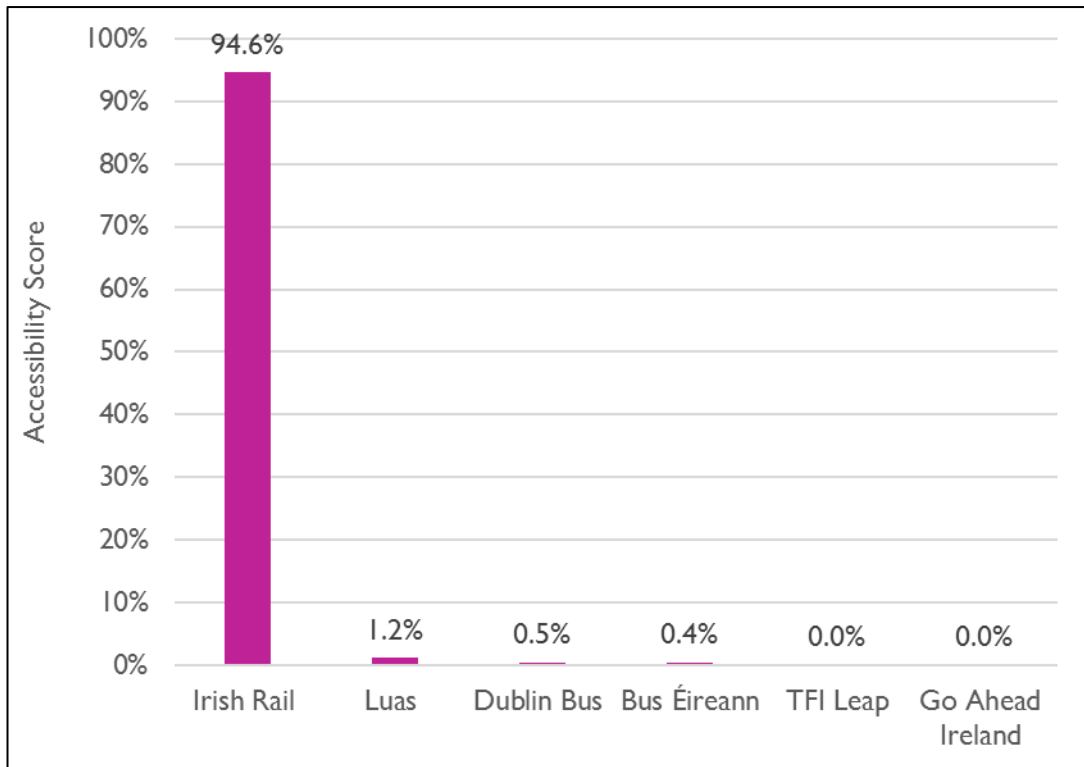
Figure 3.3.5: Average Accessibility Scores – transport service providers

4. Higher Education Institutions

NDA conducted Simplified Reviews on the main websites of 22 Higher Education institutions (HEIs). The Simplified Reviews did not include student or staff extranets such as Learning Management Systems or other online services provided by HEIs accessed via a username and password.

Errors and user impact

The average number of errors on HEI websites was marginally lower than that of All Sites reviewed (Figure 3.41) . The average Accessibility Score for HEIs (31.9%) was slightly higher than that for All Sites (30.7%)(Figure 3.4.2).
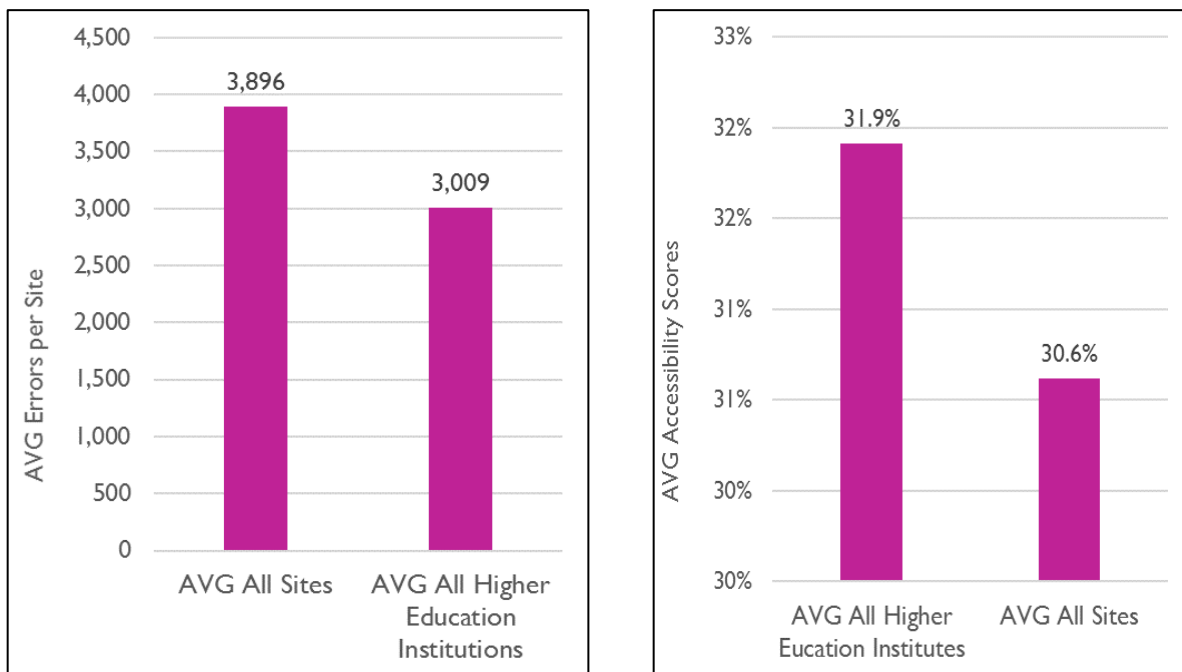
Figure 3.4.1: Average Number of Errors Figure 3.4.2: Average Accessibility Score

Types of errors - Higher Education Institutions

"Name, Role, Value" accounted for the highest number of errors on a majority of HEI websites (Figure 3.4.3). Errors related to "Name, Role Value" were frequently associated with interactive elements on the website which have not been designed or fully tested for accessibility. Notably, colour contrast errors did not occur as one of the top issues on HEI websites in comparison to the 2021 monitoring period in which it was the most frequently occurring issue. This may be due in part to some HEIs improving the colour palette used on their websites.
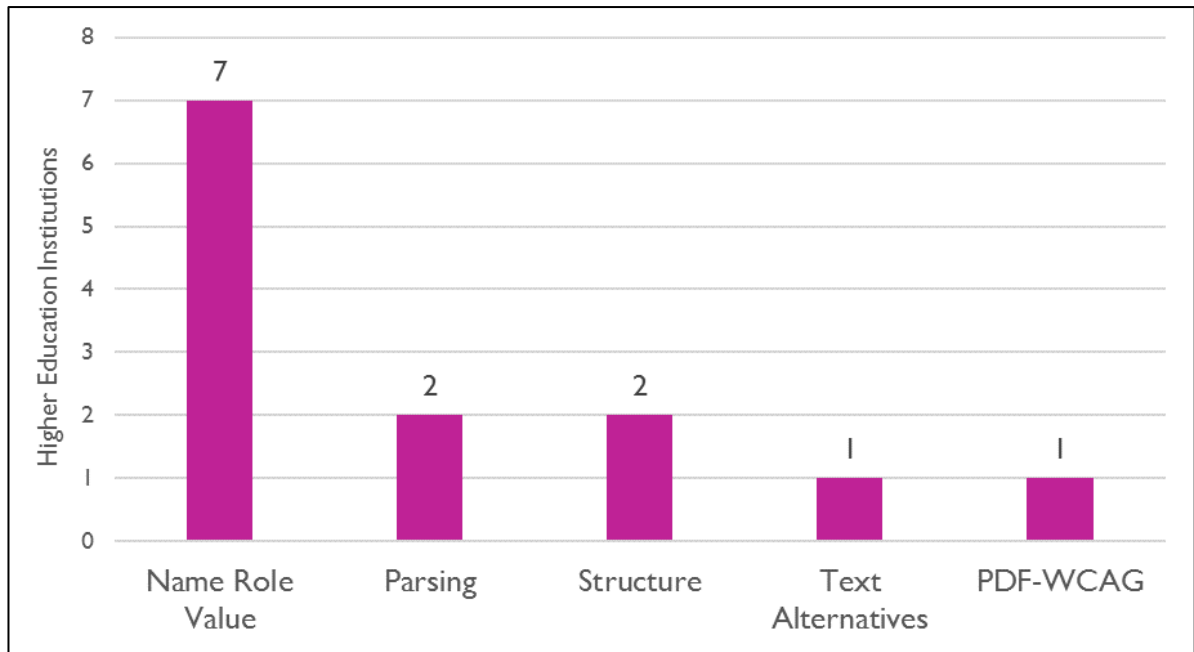
Figure 3.4.3: Frequency of occurrence of main errors – Higher Education Institutions

Errors and Accessibility Score per site – Higher Education Institutions
There was a very large variance in the number of errors across all HEI websites. As newer Technological Universities such as the Atlantic Technological University (ATU), Munster Technological University (MTU), Technological University of the Shannon (TUS) and the South East Technological University (SETU) consolidate their web presence, these institutions have an opportunity to significantly improve the accessibility of their web presence. Larger universities such as UCD have hundreds of websites belonging to the institution. Consolidating and rationalising this large number of websites presents an opportunity to introduce a high standard of accessibility across the institution's web presence. Figure 3.4.4 presents the number of errors per site by HEI.
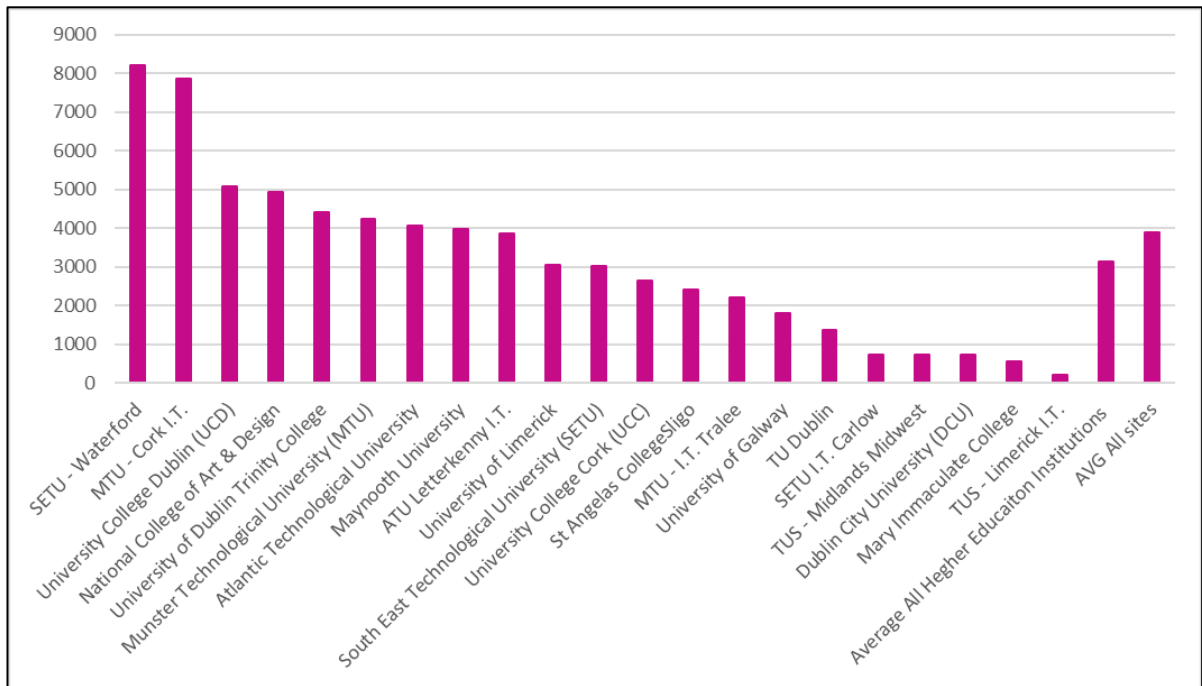
Figure 3.4.4: Total number of errors per site – Higher Education Institutions

There is a strong correlation between the low number of errors and a high Accessibility Score across HEI's. Overall, HEI websites contain a lot of errors that should be addressed as part of routine and ongoing development and maintenance of their websites. Figure 3.4.5 presents the accessibility scores by HEI.
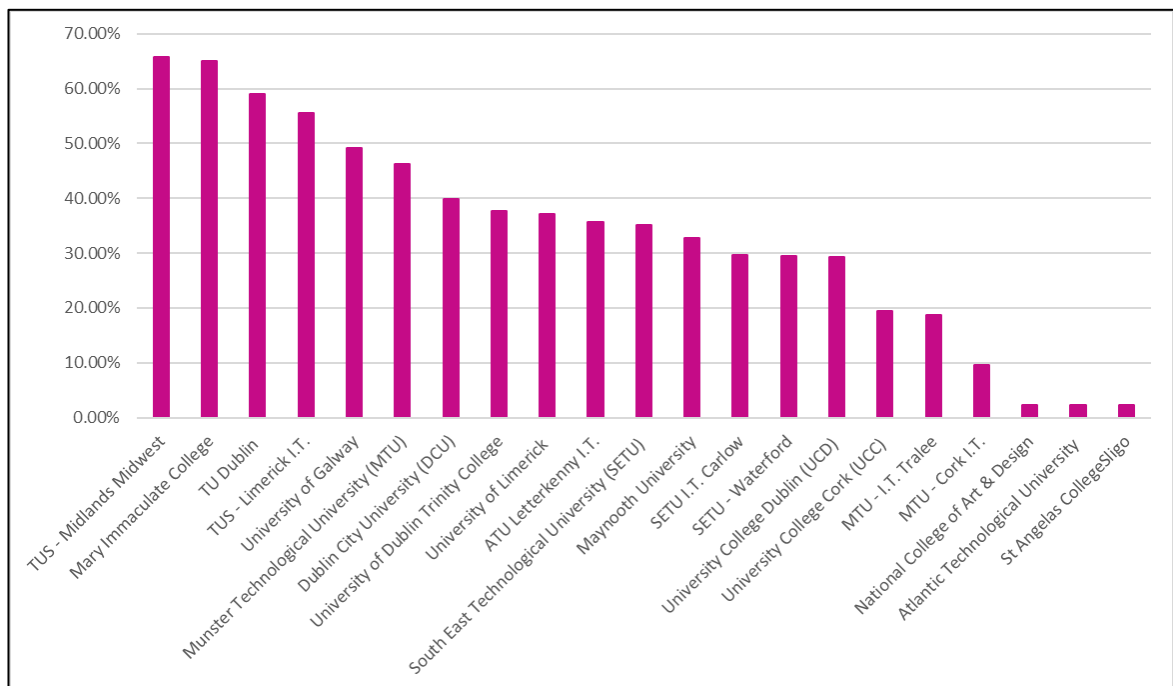
Figure 3.4.5: Accessibility Scores – Higher Education Institutes

4. Conclusion

This report has presented monitoring data for Ireland for the 2022 monitoring period.

NDA has observed some public bodies continuing to make steady improvements in the accessibility of their websites through using their monitoring data to drive improvements. Many public bodies in this monitoring period have addressed a high volume of issues related to colour contrast and incorrect coding of page template elements. NDA emphasises that automated testing scores do not equal compliance and all public bodies are encouraged to conduct an accessibility review to identify the range of accessibility issues on their site and plan for remediation of these.

The low level of compliance of mobile apps, in particular those in the transport sector, is notable. NDA recommends that the National Transport Authority and transport providers take steps to ensure that these issues are remediated and that all new mobile apps are fully compliant with the Directive.

There is a paucity of information on public sector websites and mobile apps about their accessibility and where people may go to ask for assistance or make a complaint. An Accessibility Statement based on a template provided by the Commission is a mandatory requirement under the Directive and all public bodies should ensure they publish and maintain one on their website or link to from their mobile app.[36]

During the 2022 monitoring period, NDA commenced monitoring secure government service websites, namely the myAccount and ROS sites of the Revenue Commissioners. NDA will continue during the 2023 monitoring period to work with government departments and higher education institutions to conduct reviews on secure transactional websites and virtual learning environment (VLEs).

NDA continues to collaborate with the Government Information Service (Department of an Taoiseach) and the OGCIO to support and advise Government Departments improve the accessibility of their digital content.

NDA will continue to partner with the Irish Computer Society to provide training events and information webinars on web and mobile app accessibility and related topics.[37]

 NDA will submit the next monitoring report to the European Commission for the period 2022-2024 in December 2024, as required under the Directive.

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[36] NDA guidance on Accessibility Statements

[37] https://universaldesign.ie/technology-ict/web-and-mobile-app-accessibility/guidance-and-resources/nda-ics-web-accessibility-directive-training-series/

5. Annex - Accessible Tables

This annex presents the top 10 WCAG issues identified for the 21 websites and 11 mobile apps that were subject to an in-depth review.

5.1 Websites

An Post
Table 1.1.4: Top 10 WCAG Issues

Success Criteria	Description	Occurrences
1.3.1	Info & Relationships	10
1.4.11	Non-Text Contrast	9
1.1.1	Non-Text Content	7
2.1.1	Keyboard	6
4.1.2	Name, Role, Value	6
2.4.3	Focus Order	5
1.3.2	Meaningful Sequence	4
1.4.3	Contrast (Minimum)	4
2.4.4	Link Purpose (In Context)	4
3.1.2	Language of Parts	3
	Other Success Criteria	14

Bus Éireann
Table 1.2.4: Top 10 WCAG Issues

Success Criteria	Description	Occurrences
1.4.3	Contrast (Minimum)	233
4.1.2	Name, Role, Value	29
1.3.1	Info & Relationships	17
2.4.3	Focus Order	11
4.1.1	Parsing	9
1.4.1	Use of Colour	6
2.1.1	Keyboard	6
1.3.2	Meaningful Sequence	5

Success Criteria	Description	Occurrences
1.4.4	Resize Text	4
1.4.10	Reflow	3
	Other Success Criteria	18

City of Dublin Education and Training Board
Table 1.3.4 Top 10 WCAG Issues

Success Criteria	Description	Occurrences
1.4.3	Contrast (Minimum)	122
1.3.1	Info & Relationships	19
1.4.11	Non-Text Contrast	12
4.1.1	Parsing	12
4.1.2	Name, Role, Value	10
1.1.1	Non-Text Content	6
2.4.7	Focus Visible	5
1.4.10	Reflow	4
1.3.3	Sensory Characteristics	3
1.3.4	Orientation	3
	Other Success Criteria	22

Department of Social Protection
Table 1.4.4 Top 10 WCAG Issues

Success Criteria	Description	Occurrences
1.3.1	Info & Relationships	67
1.4.11	Non-Text Contrast	8
4.1.2	Name, Role, Value	8
1.4.1	Use of Colour	5
1.1.1	Non-Text Content	4
1.4.3	Contrast (Minimum)	4
2.5.3	Label in Name	4

Success Criteria	Description	Occurrences
2.4.4	Link Purpose (In Context)	3
2.4.6	Headings and Labels	3
2.4.7	Focus Visible	2
	Other Success Criteria	8

Dublin City Library Catalogue
Table 1.5.4 Top 10 WCAG Issues

Success Criteria	Description	Occurrences
1.4.3	Contrast (Minimum)	352
1.4.11	Non-Text Contrast	28
4.1.2	Name, Role, Value	17
1.3.1	Info & Relationships	9
1.4.1	Use of Colour	8
1.1.1	Non-Text Content	7
4.1.3	Status Messages	5
2.4.4	Link Purpose (In Context)	4
2.5.3	Label in Name	4
2.1.1	Keyboard	3
	Other Success Criteria	17

Galway County Council
Table 1.6.4 Top 10 WCAG Issues

Success Criteria	Description	Occurrences
1.4.3	Contrast (Minimum)	78
1.3.1	Info & Relationships	19
4.1.2	Name, Role, Value	10
1.4.11	Non-Text Contrast	7
2.4.2	Page Titled	7
2.1.1	Keyboard	5

Success Criteria	Description	Occurrences
1.1.1	Non-Text Content	4
1.4.10	Reflow	3
1.3.2	Meaningful Sequence	2
1.4.12	Text Spacing	2
	Other Success Criteria	16

Employability Wicklow
Table 1.7.4 Top 10 WCAG Issues

Success Criteria	Description	Occurrences
1.1.1	Non-Text Content	22
1.4.10	Reflow	17
1.3.1	Info & Relationships	14
1.4.11	Non-Text Contrast	12
2.4.3	Focus Order	7
2.4.7	Focus Visible	5
1.4.1	Use of Colour	4
1.4.3	Contrast (Minimum)	4
1.4.12	Text Spacing	3
2.1.1	Keyboard	3
	Other Success Criteria	30

Fáilte Ireland
Table 1.8.4 Top 10 WCAG Issues

Success Criteria	Description	Occurrences
1.1.1	Non-Text Content	5
1.3.1	Info & Relationships	3
1.4.1	Use of Colour	3
4.1.2	Name, Role, Value	3
1.4.10	Reflow	2

Success Criteria	Description	Occurrences
2.1.1	Keyboard	2
1.4.11	Non-Text Contrast	1
1.4.13	Content on Hover or Focus	1
1.4.3	Contrast (Minimum)	1
1.4.5	Images of Text	1
	Other Success Criteria	3

Heath Service Executive
Table 1.9.4 Top 10 WCAG Issues

Success Criteria	Description	Occurrences
4.1.2	Name, Role, Value	18
1.4.11	Non-Text Contrast	15
1.3.1	Info & Relationships	13
2.4.1	Bypass Blocks	6
2.4.3	Focus Order	6
2.4.7	Focus Visible	6
2.4.4	Link Purpose (In Context)	5
4.1.3	Status Messages	5
1.4.12	Text Spacing	4
1.4.3	Contrast (Minimum)	4
	Other Success Criteria	27

Office of the Ombudsman
Table 1.10.4 Top 10 WCAG Issues

Success Criteria	Description	Occurrences
1.3.1	Info & Relationships	18
4.1.2	Name, Role, Value	10
1.1.1	Non-Text Content	5
1.3.2	Meaningful Sequence	5

Success Criteria	Description	Occurrences
1.4.3	Contrast (Minimum)	4
2.1.1	Keyboard	4
2.4.3	Focus Order	4
2.5.3	Label in Name	4
1.4.10	Reflow	3
1.4.11	Non-Text Contrast	3
	Other Success Criteria	21

Public Appointments Service
Table 1.11.4 Top 10 WCAG Issues

Success Criteria	Description	Occurrences
4.1.2	Name, Role, Value	64
1.4.3	Contrast (Minimum)	26
1.3.1	Info & Relationships	12
1.4.11	Non-Text Contrast	9
2.1.1	Keyboard	7
1.1.1	Non-Text Content	5
2.4.3	Focus Order	5
1.4.10	Reflow	3
3.1.2	Language of Parts	3
1.4.1	Use of Colour	2
	Other Success Criteria	14

Sligo County Council
Table 1.12.4 Top 10 WCAG Issues

Success Criteria	Description	Occurrences
1.3.1	Info & Relationships	10
1.4.3	Contrast (Minimum)	10
4.1.2	Name, Role, Value	6

Success Criteria	Description	Occurrences
1.4.11	Non-Text Contrast	4
1.1.1	Non-Text Content	3
3.1.2	Language of Parts	3
1.4.4	Resize Text	2
2.2.1	Timing Adjustable	2
2.4.3	Focus Order	2
3.3.1	Error Identification	2
	Other Success Criteria	10

University of Limerick
Table 1.13.4 Top 10 WCAG Issues

Success Criteria	Description	Occurrences
4.1.1	Parsing	34
1.4.3	Contrast (Minimum)	32
1.3.1	Info & Relationships	17
4.1.2	Name, Role, Value	15
1.1.1	Non-Text Content	12
1.4.11	Non-Text Contrast	7
1.4.10	Reflow	6
2.4.3	Focus Order	4
2.4.7	Focus Visible	4
2.2.2	Pause, Stop, Hide	3
	Other Success Criteria	20

Workplace Relations Commission
Table 1.14.4 Top 10 WCAG Issues

Success Criteria	Description	Occurrences
2.1.1	Keyboard	6
1.3.1	Info & Relationships	5

Success Criteria	Description	Occurrences
1.4.10	Reflow	5
4.1.2	Name, Role, Value	5
3.1.2	Language of Parts	4
1.4.4	Resize Text	3
2.4.3	Focus Order	3
2.4.4	Link Purpose (In Context)	3
1.1.1	Non-Text Content	2
1.4.1	Use of Colour	2
	Other Success Criteria	16

National Council for Special Education
Table 1.15.4 Top 10 WCAG Issues

Success Criteria	Description	Occurrences
1.4.3	Contrast (Minimum)	28
4.1.2	Name, Role, Value	28
1.3.1	Info & Relationships	23
1.4.11	Non-Text Contrast	12
1.4.12	Text Spacing	10
4.1.1	Parsing	10
2.1.1	Keyboard	6
1.4.10	Reflow	5
2.4.7	Focus Visible	5
1.1.1	Non-Text Content	4
	Other Success Criteria	24

Housing Agency
Table 1.16.4 Top 10 WCAG Issues

Success Criteria	Description	Occurrences
4.1.1	Parsing	72

Success Criteria	Description	Occurrences
4.1.2	Name, Role, Value	36
1.1.1	Non-Text Content	12
1.3.1	Info & Relationships	12
1.4.11	Non-Text Contrast	11
1.4.1	Use of Colour	10
1.4.3	Contrast (Minimum)	8
2.4.1	Bypass Blocks	6
2.4.7	Focus Visible	4
1.3.2	Meaningful Sequence	3
	Other Success Criteria	25

Solas
Table 1.17.4 Top 10 WCAG Issues

Success Criteria	Description	Occurrences
1.3.1	Info & Relationships	23
4.1.2	Name, Role, Value	15
1.4.10	Reflow	6
2.1.1	Keyboard	6
4.1.1	Parsing	6
1.1.1	Non-Text Content	4
1.4.12	Text Spacing	3
1.4.3	Contrast (Minimum)	3
1.4.4	Resize Text	3
1.3.2	Meaningful Sequence	2
	Other Success Criteria	8

Mayo County Council
Table 1.18.4 Top 10 WCAG Issues

Success Criteria	Description	Occurrences
1.4.3	Contrast (Minimum)	29
4.1.2	Name, Role, Value	16
1.3.1	Info & Relationships	10
1.4.11	Non-Text Contrast	6
2.4.3	Focus Order	5
1.4.10	Reflow	3
2.4.4	Link Purpose (In Context)	3
1.1.1	Non-Text Content	2
1.4.12	Text Spacing	2
1.4.4	Resize Text	2
	Other Success Criteria	14

myAccount (Revenue)
Table 1.19.4 Top 10 WCAG Issues

Success Criteria	Description	Occurrences
1.4.3	Contrast (Minimum)	47
4.1.2	Name, Role, Value	24
1.3.1	Info & Relationships	18
2.4.2	Page Titled	16
1.1.1	Non-Text Content	13
4.1.3	Status Messages	11
4.1.1	Parsing	10
1.3.5	Identify Input Purpose	8
2.4.3	Focus Order	6
2.5.3	Label in Name	6
	Other Success Criteria	37

National Concert Hall
Table 1.20.4 Top 10 WCAG Issues

Success Criteria	Description	Occurrences
1.4.3	Contrast (Minimum)	40
1.4.11	Non-Text Contrast	21
4.1.2	Name, Role, Value	19
1.3.1	Info & Relationships	16
1.4.10	Reflow	7
4.1.1	Parsing	7
1.3.2	Meaningful Sequence	5
2.4.3	Focus Order	5
1.3.5	Identify Input Purpose	4
2.1.1	Keyboard	4
	Other Success Criteria	18

Revenue Online Service (ROS)
Table 1.21.4 Top 10 WCAG Issues

Success Criteria	Description	Occurrences
1.3.1	Info & Relationships	197
1.4.3	Contrast (Minimum)	86
4.1.2	Name, Role, Value	14
3.1.1	Language of Page	12
1.4.10	Reflow	11
2.5.3	Label in Name	8
4.1.1	Parsing	8
3.1.2	Language of Parts	5
4.1.3	Status Messages	5
1.3.5	Identify Input Purpose	4
	Other Success Criteria	29

5.2 Mobile Apps

An Post App Android
Table Table2.1.4: Top 10 WCAG Issues

Success Criteria	Description	Occurrences
1.3.1	Info & Relationships	6
1.3.2	Meaningful Sequence	5
4.1.2	Name, Role, Value	5
1.4.3	Contrast (Minimum)	4
2.1.1	Keyboard	4
2.5.3	Label in Name	4
4.1.3	Status Messages	3
1.4.11	Non-Text Contrast	2
2.4.3	Focus Order	2
1.1.1	Non-Text Content	1
	Other Success Criteria	2

Dublin City Library App Android
TableTable 2.2.4: Top 10 WCAG Issues

Success Criteria	Description	Occurrences
1.4.3	Contrast (Minimum)	13
2.1.1	Keyboard	8
4.1.2	Name, Role, Value	5
1.3.1	Info & Relationships	4
1.4.11	Non-Text Contrast	4
1.3.2	Meaningful Sequence	3
1.1.1	Non-Text Content	2
2.4.3	Focus Order	2
1.4.1	Use of Colour	1
2.4.6	Headings and Labels	1
	Other Success Criteria	2

Dublin City Library App iOS
Table 2.3.4: Top 10 WCAG Issues

Success Criteria	Description	Occurrences
1.4.3	Contrast (Minimum)	15
4.1.2	Name, Role, Value	11
1.1.1	Non-Text Content	8
1.3.1	Info & Relationships	5
1.4.11	Non-Text Contrast	4
1.3.2	Meaningful Sequence	3
1.4.1	Use of Colour	2
2.1.1	Keyboard	2
3.3.2	Labels or Instructions	2
2.4.6	Headings and Labels	1
	Other Success Criteria	1

HSE Covid Tracker App Android
Table 2.4.4: Top 10 WCAG Issues

Success Criteria	Description	Occurrences
2.1.1	Keyboard	9
1.1.1	Non-Text Content	5
1.3.1	Info & Relationships	4
1.4.11	Non-Text Contrast	4
1.4.1	Use of Colour	3
3.3.2	Labels or Instructions	2
1.3.4	Orientation	1
2.4.6	Headings and Labels	1
1.2.1	Audio-only and Video-only (Pre-recorded)	0
1.2.2	Captions (Pre-recorded)	0
	Other Success Criteria	0

HSE Covid Tracker App iOS
Table 2.5.4: Top 10 WCAG Issues

Success Criteria	Description	Occurrences
1.1.1	Non-Text Content	5
1.4.11	Non-Text Contrast	5
1.3.1	Info & Relationships	4
1.4.1	Use of Colour	3
4.1.2	Name, Role, Value	3
2.1.1	Keyboard	2
2.5.3	Label in Name	2
3.3.2	Labels or Instructions	2
1.3.4	Orientation	1
2.4.6	Headings and Labels	1
	Other Success Criteria	1

Leap Top-up App Android
Table 2.6.4: Top 10 WCAG Issues

Success Criteria	Description	Occurrences
1.4.11	Non-Text Contrast	2
1.1.1	Non-Text Content	1
1.3.4	Orientation	1
2.1.2	No Keyboard Trap	1
2.2.1	Timing Adjustable	1
1.2.1	Audio-only and Video-only (Pre-recorded)	0
1.2.2	Captions (Pre-recorded)	0
1.2.3	Audio Description or Media Alternative (Pre-recorded)	0
1.2.4	Captions (Live)	0
1.2.5	Audio Description (Pre-recorded)	0
	Other Success Criteria	0

HSE Health Passport App Android
Table 2.7.4: Top 10 WCAG Issues

Success Criteria	Description	Occurrences
1.1.1	Non-Text Content	6
4.1.2	Name, Role, Value	3
1.3.2	Meaningful Sequence	2
1.4.11	Non-Text Contrast	2
1.4.3	Contrast (Minimum)	2
1.3.4	Orientation	1
2.4.3	Focus Order	1
1.2.1	Audio-only and Video-only (Pre-recorded)	0
1.2.2	Captions (Pre-recorded)	0
1.2.3	Audio Description or Media Alternative (Pre-recorded)	0
	Other Success Criteria	0

Irish Rail App Android
Table 2.8.4: Top 10 WCAG Issues

Success Criteria	Description	Occurrences
1.4.3	Contrast (Minimum)	10
1.3.1	Info & Relationships	6
2.4.6	Headings and Labels	2
1.3.4	Orientation	1
1.4.11	Non-Text Contrast	1
1.1.1	Non-Text Content	0
1.2.1	Audio-only and Video-only (Pre-recorded)	0
1.2.2	Captions (Pre-recorded)	0
1.2.3	Audio Description or Media Alternative (Pre-recorded)	0
1.2.4	Captions (Live)	0

Success Criteria	Description	Occurrences
	Other Success Criteria	0

Irish Rail App iOS
Table 2.9.4: Top 10 WCAG Issues

Success Criteria	Description	Occurrences
1.4.3	Contrast (Minimum)	14
1.3.1	Info & Relationships	5
1.4.11	Non-Text Contrast	5
2.1.1	Keyboard	4
4.1.2	Name, Role, Value	4
1.3.2	Meaningful Sequence	3
2.4.6	Headings and Labels	2
1.1.1	Non-Text Content	1
1.3.4	Orientation	1
1.4.1	Use of Colour	1
	Other Success Criteria	3

Real Time Ireland App Android
Table 2.10.4: Top 10 WCAG Issues

Success Criteria	Description	Occurrences
2.1.1	Keyboard	11
4.1.2	Name, Role, Value	9
1.3.2	Meaningful Sequence	5
1.4.11	Non-Text Contrast	4
1.4.3	Contrast (Minimum)	4
1.3.1	Info & Relationships	3
2.4.6	Headings and Labels	3
2.5.3	Label in Name	2
1.1.1	Non-Text Content	1

Success Criteria	Description	Occurrences
1.3.4	Orientation	1
	Other Success Criteria	3

Real Time Ireland App iOS
Table 2.11.4: Top 10 WCAG Issues

Success Criteria	Description	Occurrences
4.1.2	Name, Role, Value	7
1.1.1	Non-Text Content	5
1.4.11	Non-Text Contrast	5
1.4.3	Contrast (Minimum)	5
1.3.1	Info & Relationships	4
1.3.2	Meaningful Sequence	4
2.1.2	No Keyboard Trap	3
2.4.6	Headings and Labels	3
2.1.1	Keyboard	2
2.5.3	Label in Name	2
	Other Success Criteria	5

5.3 Simplified Reviews

Table 3.3.1: Average errors per site – PDF's published by government departments

Government Department	Average Errors per site
Dept Environment Climate & Communications	1,482
Dept Health	919
Dept Finance	676
Dept Taoiseach	664
Dept Children Equality Disability Integration & Youth - gov.ie PDFs	613
Dept Rural & Community Development	611
Dept Justice	608
Dept Foreign Affairs	568
Dept Housing Local Gov & Heritage	483
Dept Further Higher Ed. Innovation & Science	453
Dept Agriculture Food and the Marine	320
Dept Education	269
Dept Public Expenditure & Reform	209
Dept Tourism Culture Arts Gaeltacht Sport & Media	206
Dept Defence	137
Dept Transport	114
Dept Social Protection	72

Table 3.1.2: Accessibility Score – PDF's published by government departments

Government Department	Accessibility Score
Dept Agriculture Food and the Marine	12%
Dept Children Equality Disability Integration & Youth	12%
Dept Public Expenditure & Reform	12%
Dept Rural & Community Development	8%
Dept Further Higher Ed. Innovation & Science	4%
Dept Finance	4%
Dept Justice	4%
Dept Taoiseach	0%
Dept Environment Climate & Communications	0%
Dept Foreign Affairs	0%
Dept Defence	0%
Dept Social Protection	0%
Dept Health	0%
Dept Education	0%
Dept Housing Local Gov & Heritage	0%
Dept Tourism Culture Arts Gaeltacht Sport & Media	0%

| Dept Transport | 0% |

Table 3.2.1: Total Number of Errors per site – Local Authorities

Local Authority	Average errors per site
Wicklow County Council	96,784
Dún Laoghaire-Rathdown County Council	16,636
Carlow County Council	12,217
Monaghan County Council	11,890
Donegal County Council	8,712
Galway County Council	8,637
Tipperary County Council	8,130
Offaly County Council	6,668
Fingal County Council	6,434
Westmeath County Council	4,289
Limerick City & County Council	4,286
Laois County Council	4,277
Louth County Council	3,980
Galway City Council	3,595
Roscommon County Council	2,988
Cork City Council	2,127
Kerry County Council	2,073
Clare County Council	1,877
Wexford County Council	1,697
Sligo County Council	1,219
Cork County Council	1,064
Meath County Council	916
Kilkenny County Council	458
Longford County Council	339
Waterford City & County Council	248
Kildare County Council	233
Dublin City Council	121
Cavan County Council	73
Mayo County Council	63
South Dublin County Council	21
AVG All Local Authorities	**7,068**
AVG All Sites	**3,896**

Table 3.2.2: Average accessibility scores – Local Authorities

Local Authority	Accessibility Score

South Dublin County Council	98.7%
Cork County Council	96.1%
Cavan County Council	96.1%
Mayo County Council	95.5%
Kildare County Council	94.6%
Dublin City Council	92.5%
Sligo County Council	84.6%
Kilkenny County Council	81.5%
Tipperary County Council	43.6%
Longford County Council	40.8%
Meath County Council	40.6%
Waterford City & County Council	40.6%
Clare County Council	38.3%
Wicklow County Council	38.3%
Westmeath County Council	37.5%
Donegal County Council	34.3%
Galway City Council	32.3%
Limerick City & County Council	29.9%
Carlow County Council	15.1%
Dún Laoghaire-Rathdown County Council	12.4%
Roscommon County Council	4.5%
Wexford County Council	3.6%
Kerry County Council	0.9%
Fingal County Council	0.5%
Cork City Council	0.3%
Galway County Council	0.3%
Laois County Council	0.1%
Monaghan County Council	0.1%
Louth County Council	0.0%
Offaly County Council	0.0%
AVG All Local Authorities	**38.45%**
AVG All Sites	**30.62%**

Table 3.3.1 Total number of errors per site – Higher Education Institutions

Higher Education Institute	Errors per site
SETU - Waterford	8229
MTU - Cork I.T.	7871
University College Dublin (UCD)	5081
National College of Art & Design	4952

University of Dublin Trinity College	4412
Munster Technological University (MTU)	4242
Atlantic Technological University	4063
Maynooth University	3979
ATU Letterkenny I.T.	3859
University of Limerick	3040
South East Technological University (SETU)	3020
University College Cork (UCC)	2656
St Angelas College Sligo	2404
MTU - I.T. Tralee	2214
University of Galway	1818
TU Dublin	1361
SETU I.T. Carlow	736
TUS - Midlands Midwest	731
Dublin City University (DCU)	727
Mary Immaculate College	567
TUS - Limerick I.T.	201
Average All Higher Education Institutions	**3151**
AVG All sites	**3896**

Table 3.3.2: Accessibility Scores – Higher Education Institutes

Higher Education Institute	Accessibility Score
TUS - Midlands Midwest	65.7%
Mary Immaculate College	65%
TU Dublin	58.9%
TUS - Limerick I.T.	55.6%
University of Galway	49.2%
Munster Technological University (MTU)	46.2%
Dublin City University (DCU)	39.7%
University of Dublin Trinity College	37.7%
University of Limerick	37.1%
ATU Letterkenny I.T.	35.5%
South East Technological University (SETU)	35%
Maynooth University	32.8%
SETU I.T. Carlow	29.6%
SETU - Waterford	29.5%
University College Dublin (UCD)	29.3%
University College Cork (UCC)	19.4%
MTU - I.T. Tralee	18.7%
MTU - Cork I.T.	9.5%
National College of Art & Design	2.3%

Atlantic Technological University	2.2%
St Angelas College Sligo	2.2%