MALTA COMMUNICATIONS AUTHORITY

Report on the outcome of the monitoring and use of the enforcement procedure as per Directive (EU) 2016/2102 and CID (EU) 2018/1524

Malta Report

16th December 2024

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List of Abbreviations

ADHD	Attention Deficit Hyperactivity disorder
CID	Commission Implementing Decision
CIO	Chief Information Officer
CMS	Content Management System
CRPD	Commission for the Rights of Persons with Disability
DSA	The Digital Services Act
DSC	Digital Services Coordinator
EN	European Norm
EU	European Union
FITA	Foundation for Information Technology Accessibility
HTML	Hypertext Mark-up Language
JAWS	Job Access with Speech
LAU	Local Administrative Unit
MCA	Malta Communications Authority
MITA	Malta Information Technology Agency
MoU	Memorandum of Understanding
NGO	Non-governmental organisation
NUTS	Nomenclature of territorial units for statistics
NVDA	Non visual Desktop Access
ODI	Office for Disability Issues
PDF	Portable Document Format
PR	Public Relations
ToRB	Terms of Reasonableness Board
UOM	University of Malta
WAD	Web Accessibility Directive
WAI-ARIA	Web Accessibility Initiative – Accessible Rich Internet Applications
WCAG	Web Content Accessibility Guidelines
W3C	World Wide Web Consortium

1. EXECUTIVE SUMMARY OF THE REPORT

This report covers the fundamental aspects related to the implementation of 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. This Directive focuses on enhancing the accessibility of public sector websites and mobile applications, commonly known as the "Directive" or "WAD," in Malta.

The MCA (also referred to as the “Authority”) was designated by the Government of Malta to implement the monitoring, reporting and enforcement tasks in accordance with the norms stated in the Directive. Once this designation was formalised, the MCA started working on various fronts related to the transposition of the Directive into Maltese national law, the setting up of internal policies and procedures to support this new work stream and the establishment of a network of parties with an interest in digital accessibility.

The MCA has established a transparent process to facilitate the effective monitoring and enforcement of the WAD. This process entails ensuring that all relevant parties, including Ministry CIOs, heads of various public sector entities, and the general public, are briefed on the aims and benefits of this initiative and on the associated responsibilities that they carry. Maintaining ongoing communication with these stakeholders has been crucial for the successful implementation of the process, which is now firmly established.

The MCA utilises various website testing tools. These underwent trials before being integrated into the monitoring methodology. Employing a standardised set of tools enables the MCA to streamline the process while ensuring consistency in testing procedures.

The sampling methodology being utilised is based on a consultative approach, primarily engaging a specifically formed focus group. This group is regularly consulted to determine the yearly sample for assessment and to address any ongoing issues and challenges encountered by the community. This collaborative effort involves key stakeholders, including the national CRPD and FITA. The MCA has fostered a long-standing positive relationship with these expert bodies, actively seeking their feedback and input on a continuous basis.

Based on Malta’s population, a minimum of 85 public sector websites are assessed on a yearly basis through the simplified method whilst 14 public sector websites and 7 public sector Apps are assessed on a yearly basis through the In-Depth method. This assessment process has led to a noticeable enhancement in the accessibility standards of public sector websites. The support and collaboration from the various government entities have been exceedingly favourable, enabling the MCA to conduct initial assessments and subsequent re-tests, typically at six-month intervals, to ensure ongoing improvement aiming to result in compliance with the Directive n.

In this second monitoring cycle (2022–2024), the Government of Malta implemented a major investment in updating its website templates, transitioning to WordPress, and prioritising web accessibility as a key and basic element. By transitioning to the new platform, Government gained access to a more user-friendly content management system that facilitates easy updates and maintenance of the websites. WordPress also offers a wide range of built-in accessibility features, making it easier to achieve compliance with web accessibility standards. The MCA participated in consultative discussions and conducted testing on various test sites throughout this transitional process.

More details on the specifics of this development are given in section 3 of this report.

he MCA continuously strives to adapt and refine the implementation processes of the WAD, drawing from feedback from its diverse partners and from its own experience in the ongoing Directive implementation. In 2024, for instance, the MCA introduced minor modifications to the In-Depth scoring methodology, which included the introduction of a subjective partial rating based on users' overall experience during website testing. Given that the In-Depth monitoring process relies heavily on manual assessments conducted by individuals with varying abilities and disabilities, it was deemed essential to incorporate some weighting based on their personal experiences while navigating the websites.

Furthermore, recognising education as pivotal for improvement, the MCA recently partnered with the University of Malta and the eSkills Malta Foundation to develop and conduct tailored training sessions for ICT Public Service officials. These have proved to be very successful and, given the encouraging participation and feedback received, the MCA plans to repeat and refine these courses on a regular basis. In fact, the second cycle of training will be rolled out in November and December 2024

The persistent endeavour to fine-tune all testing processes, coupled with ongoing awareness campaigns and educational initiatives throughout the implementation of the Directive, bodes well for a more accessible public sector in the years to come.

Any reference to the DIRECTIVE (EU) 2016/2102 or the Web Accessibility Directive refers to the *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* as published by the European Commission on the 26 October 2016 and available at Link to WAD Text .

Any reference to *Commission Implementing Decision (EU) 2018/1524* refers to the *Commission Implementing Decision (EU) 2018/1524* as published by the European Commission on the 11th October 2018 and available *at Link to Commission Implementing Decision (EU) 2018/1524* .

This report's structure is based on the aforementioned Commission Implementing Decision (EU) 2018/1524.

2. DESCRIPTION OF THE MONITORING ACTIVITIES

2.1 General Information

2.1.1 Monitoring Period

Monitoring period: 01/01/2022 to 22/12/2024

2.1.2 Monitoring Body

The MCA was established on the 1st January 2001 and is the statutory body responsible for the regulation of the various electronic communications sectors, which include fixed and mobile telephony, Internet and TV distribution services. Moreover, the Authority regulates two other sectors which are the postal services, and electronic commerce ('eCommerce').

Given the MCA's extensive experience in digital regulation, it was deemed appropriate by Government to include the implementation of the Web Accessibility Directive (EU) 2016/2102 as part of the MCA's regulatory remit.

The MCA is also designated as the Supervisory Body for trust services under the eIDAS Regulation. This Regulation aims to facilitate secure cross-border transactions by establishing a comprehensive framework for digital identity and authentication. It seeks to create confidence in electronic interactions and promote seamless digital services across the EU. By providing a common foundation for secure electronic interactions between citizens, businesses, and public authorities, the regulation enhances the effectiveness of online services and e-commerce platforms.

In a more recent development, the MCA has also been appointed as the Digital Services Coordinator (DSC) for Malta, to enforce the Digital Services Act ('DSA')

The Digital Services Act ('DSA')[1] is a cornerstone of the EU's digital strategy, aiming to create a safer and more accountable online environment. It introduces comprehensive rules for providers of intermediary services, such as social media platforms and online marketplaces, demanding greater transparency and responsibility in handling illegal content. By enforcing these laws, the DSA aims to protect users and their rights online, ensuring digital spaces across the European Union operate under a uniform framework.

The MCA's responsibilities as Malta's DSC include ensuring that providers established in Malta comply with their obligations under the DSA, conducting supervisory activities, and handling complaints related to the DSA. The MCA acts as a central point of contact for both providers and users, facilitating a balanced and effective approach to digital service regulation. In addition, the MCA participates in the Digital Services Board led by the European Commission, which Board is responsible for overseeing compliance with the Digital Services Act throughout the EU.

2.1.3 Monitoring Sample Representativeness and Distribution

I. Monitoring Sample Geographical Limitations

Malta has a population of circa 536,573 inhabitants, a total area of 246 square kilometres, and it is the smallest EU member state. Due to its small geographical size and population, Malta's different regions are not classified as being major socio-economic regions (NUTS level 1) or basic regions (NUTS level 2) since they do not have enough inhabitants to qualify as such. Currently, Malta does not have any NUTS level 1 or NUTS level 2 territories and only two NUTS level 3 territories (Malta and Gozo, and Comino) are recognised.

As of 2024, the largest town in Malta by population is St. Paul's Bay. It has grown significantly in recent years, surpassing other towns and cities in terms of population size. St. Paul's Bay is located in the northern part of the island and is known for its tourist attractions, beaches, and historical sites. Currently, St Paul's Bay has a total population of approximately 36,013 inhabitants. When taking into consideration separate LAUs, the average population is of approximately 7,890 inhabitants.

The small population and close geographical proximity as well as the very small area of the country which forms the two NUTS level 3 territories made it unfeasible for the Authority to consider websites at a regional level.

II. Representativeness of sample

As previously mentioned, a web accessibility focus group was established, overseen by the Commission for the Rights of Persons with Disability (CRPD), to address current web accessibility issues. This group provides feedback and insights, on behalf of individuals with disabilities, regarding the appropriateness of the Directive's processes. On an annual basis, the focus group reviews and endorses the selected sample, maintaining a consistent active role throughout the entire process.

The CRPD in Malta has been active since 1987 and has since operated in the social sector to eliminate any form of direct or indirect social discrimination against persons with disability and their families, while providing them with the necessary assistance and support. A representative from FITA is also part of the web accessibility focus group.

The Foundation for Information Technology Accessibility (FITA) was set up in 2000 by the Malta Information Technology Agency (MITA) and the Commission for the Rights of Persons with Disability (CRPD) with the aim of addressing the digital divide, and empowering disabled persons and senior citizens to make the most effective use of information communications technology (ICT).

The other members of the focus group are staff from the MCA working on the WAD, representatives from various disability NGOs and other parties interested in the rights of persons with disabilities.

The web accessibility focus group meets at least once annually. Other *ad hoc* meetings are carried out as required.

III. *Identification of Websites and Mobile Applications*

In 2019, prior to the first monitoring period, an exercise that focused on Government's ministries' structure was conducted to determine the number of websites and mobile applications used by public sector bodies which would fall under the scope of the Directive. However, due to periodic changes in ministry structures, this identification process needs to be revised and updated on a regular basis. To ensure accuracy and relevance, the MCA maintains regular contact with Ministry CIOs. This communication facilitates the timely inclusion of newly launched public sector websites and apps in the monitoring sample lists, while also ensuring that decommissioned sites are promptly removed.

Each year, the Malta Communications Authority (MCA), in collaboration with the aforementioned focus group, conducts the sampling process to ensure that the sample for the monitoring year reflects, the interests and priorities of persons with disabilities amongst others. This procedure is meticulously designed to systematically select a diverse array of websites and applications for monitoring across all ministries, with careful consideration given to the needs and priorities of individuals with disabilities.

IV. *Territorial Representation and Distribution*

During the initial identification of websites and mobile applications, when extensive discussions were held with the relevant stakeholders through the web accessibility focus group, the Government CIOs Forum and other relevant parties, it was observed that many websites which fall within the scope of monitoring operate at a national level and do not fall under specific regions or economic territories. This is also a result of the country's small geographical size, which can be viewed as a single region.

In fact, only a very small percentage of local websites operate or offer services within a specific geographical territory. These primarily encompass local council websites, specific school platforms, and Gozo-related websites. However, it's important to note that, in general, all local public sector websites are deemed relevant to the society at large and cannot be classified as regional.

V. *Public Sector Representation and Distribution*

The different public sector bodies in Malta are represented within various Ministries which form the Government of Malta. The website monitoring sample was chosen based on the following factors to ensure a fair representation of the Maltese public sector;

Equal distribution - Where possible, the monitoring sample included websites from all the different ministries currently set by the Government.

Size distribution - Ministries which include a larger number of websites under their remit were proportionately represented in the monitoring sample.

Ministries with significant impact on persons with disabilities – Ministries that offer specific services to persons with disabilities or operate within the social services sector were represented in the monitoring sample accordingly.

VI. Mobile Applications Monitoring Sample

The number of mobile applications monitored for this 2nd monitoring cycle is 21, or, more specifically, 7 annually, as per the Directive's requirements.

VII. *Operating System Representation and Distribution*

The chosen mobile applications for this monitoring period were distributed as equally as possible between the identified operating systems during the initial identification of mobile applications. Two operating systems were identified;

- iOS
- Android

VIII. Public Sector Representation and Distribution

The approach detailed in *Subsection 2.1.3.IV* above with regards to public sector distribution was also adopted for mobile applications.

IX. Further Considerations

The popularity and usage of mobile applications were also assessed using publicly available measurement data and the monitoring sample was adjusted for such mobile applications accordingly.

Due to time limitations in data collection and compilation, the statistical data presented in this report covers the period from January 2022 to June 2024.

2.2 Composition of the sample

The number of websites and mobile applications monitored were based on the number of inhabitants and the number of required websites and mobile applications as mentioned in *Annex II, Section 2* of the *Commission Implementing Decision (EU) 2018/1524*. During the monitoring period 2022 - 2024, the population in Malta was of around 530,000.

The total number of websites and mobile applications included in the sample for this monitoring period was thus **319.**

2.2.1 Simplified Monitoring

Based on the workings as listed in *Subsection 2.1.2* of the *Commission Implementing Decision (EU) 2018/1524* the minimum number of websites to be monitored in Malta each year is 10 (two per 100 000 inhabitants) plus 75 websites. The number of websites monitored using the simplified monitoring method for this monitoring period was **256.**

I. In the first year (2022) of the monitoring period, **86** websites were monitored using the simplified method.
II. In the second year (2023) of the monitoring period, **85** websites were monitored using the simplified method.
III. In the third year (2024) of the monitoring period, **85** websites were monitored using the simplified method.

2.2.2 In-Depth Monitoring

The number of websites and mobile applications monitored using the In-Depth monitoring method was **63.**

The distribution between mobile applications and websites was as follows;

I. Based on the workings listed in *Subsection 2.1.4* of the *Commission Implementing Decision (EU) 2018/1524* the minimum number of websites to be monitored in Malta each year is 4 (5% of simplified monitoring sample) plus 10 websites. The number of websites monitored using the In-Depth monitoring method was **42.**
    a. In the first year (2022) of the monitoring period, **14** websites were monitored using the In-Depth method.
    b. In the second year (2023) of the monitoring period, **14** websites were monitored using the In-Depth method.
    c. In the second year (2024) of the monitoring period, **14** websites were monitored using the In-Depth method.

II. Based on the workings listed in *Subsection 2.1.5* of the *Commission Implementing Decision (EU) 2018/1524* the minimum number of mobile applications to be monitored in Malta each year is 1 (since Malta's population is less than 1 million, one mobile application was included into the sample as a minimum) plus 6 mobile applications.

    Thus, the number of mobile applications monitored for this monitoring period was **21.**

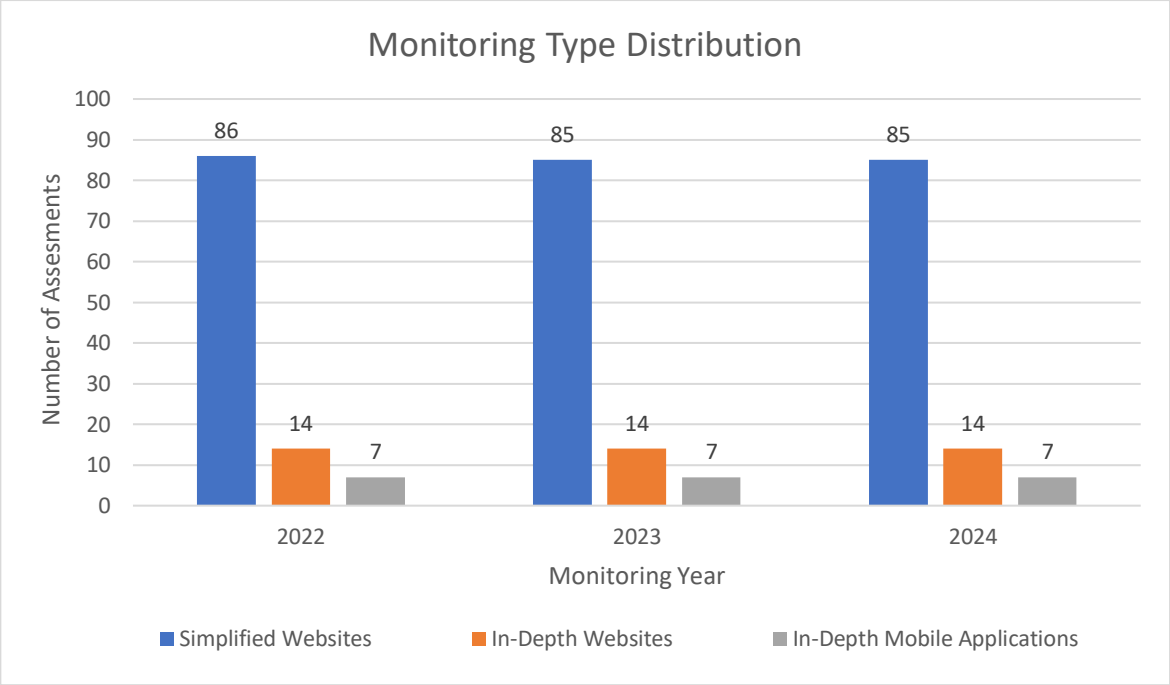


Figure 2.2.1: Distribution of websites and mobile applications over the monitoring period

2.2.3 Websites and Mobile Applications Distribution by Territory

As mentioned in *Subsection 2.1.3.III*, the vast majority of websites and mobile applications which offer services to the Maltese public do not operate within a specific local territory since Malta is itself considered a single territory. To this extent they are all classified as state websites and mobile applications. During this second monitoring period, a number of local council websites, school platforms and Gozo-related websites were incorporated into the monitoring sample for evaluation.

2.2.4 Websites Distribution by Sector

The selected websites for the monitoring sample were distributed proportionately as follows amongst the ministries in Malta ensuring all the different sectors were represented as equally as possible by using the different factors listed in *Subsection 2.1.3.IV*.

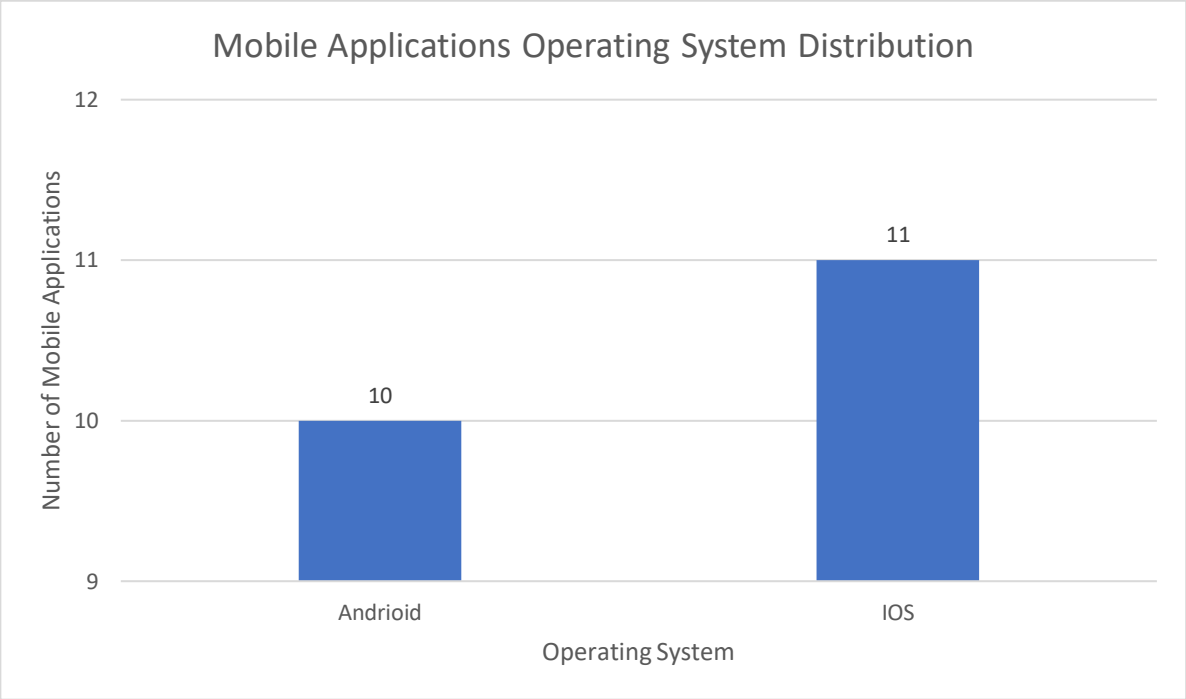
Distribution of Simplified Monitored Websites by Ministry as represented in the national government.

Ministry Name	**No. of Websites in Sample**
Office of the Prime Minister	6
Ministry for Health	27
Ministry for National Heritage, the Arts & Local Government	32
Ministry for Foreign & EU Affairs	6
Ministry for Social Policy	6
Ministry for Agriculture, Fisheries & Animal Rights	7
Ministry for the Economy	21
Ministry for Inclusion and Equality	5
Ministry for Transport	6
Ministry for Gozo	4
Ministry for Home Affairs & Security	12
Ministry for Tourism	5
Ministry for the Environment & Energy	17
Ministry for Finance	8
Ministry for Education, Sport, Youth & Innovation	42
Ministry for Public Works	1
Ministry for Justice	13

The above relates to the Simplified Monitoring sites for the sample period: January 2022 – June 2024

2.2.5 Mobile Applications Distribution by Operating System

The two identified operating systems for mobile apps were IOS and Android. The selected sample of mobile applications was distributed evenly, as much as possible, between the two operating systems identified.



2.2.6 Recurring Sample

In accordance with the Directive's stipulation, 10% of the websites and applications evaluated annually must include reassessments from the previous year's sample. This recurring sample is primarily intended to track progress, ensure ongoing compliance, and address any accessibility issues identified in prior assessments. In the case of Malta, these reassessments amount to approximately -

- 8 websites yearly for the simplified monitoring (from a total sample of 85 websites yearly)
- 1 website for the In-Depth assessment (from a total sample of 14 In-Depth websites yearly) and
- 1 mobile app In-Depth (from a total of 7 In-Depth Mobile Apps yearly).

2.3 Correlation with the standards, technical specifications and tools used for monitoring

2.3.1 Monitoring Methods Compliance with Accessibility Standards

I. Simplified Website Monitoring Methods

The simplified website monitoring process was mainly carried out using the automated testing tool mentioned below in *Subsection 2.3.1.I - Siteimprove Accessibility Checker Tool* with the exception of the accessibility statement checks. The accessibility statements were all checked manually as described in *Subsection 2.3.2.I - Accessibility Statement Compliance Checks.*

In exceptional cases, typically when testing was found to be inclusive, other tools such as AXE, WAVE and Google Lighthouse accessibility testing tools were used by the MCA as required.

II. Siteimprove Accessibility Checker Tool

In the initial stages of the Web Accessibility Directive's implementation, various applications and automated tools were assessed and tested to determine if they can be used as part of the simplified monitoring process. Factors such as ease of use, test automation, and reporting capabilities were all taken into consideration during this evaluation.

Siteimprove was eventually chosen to help automate the required tests and monitor the simplified sample of websites. Siteimprove's Accessibility Checker is able to test for a number of different WCAG criteria which span across all four required accessibility principles as set in the requirements of *Article 4 of Directive (EU) 2016/2102*.

Table 2.3.1 lists which WCAG criteria Siteimprove is able to assess programmatically and how it maps to the WCAG conformance level, the EN 301 549 standard and relevant accessibility principle.

WCAG Criteria	**Criteria Name**	**WCAG Conformance Level**	**EN Standard Mapping**	**Principle**
1.1.1	Non-text Content	A	9.1.1.1	Perceivable
1.2.1	Audio-only and Video-only (Prerecorded)	A	9.1.2.1	Perceivable
1.2.2	Captions (Prerecorded)	A	9.1.2.2	Perceivable
1.2.3	Audio Description or Media Alternative (Prerecorded)	A	9.1.2.3	Perceivable
1.2.4	Captions (Live)	AA	9.1.2.4	Perceivable
1.2.5	Audio Description (Prerecorded)	AA	9.1.2.5	Perceivable
1.3.1	Info and Relationships	A	9.1.3.1	Perceivable
1.4.1	Use of Color	A	9.1.4.1	Perceivable
1.4.2	Audio Control	A	9.1.4.2	Perceivable
1.4.3	Contrast (Minimum)	AA	9.1.4.3	Perceivable

1.4.5	Images of Text	AA	9.1.4.5	Perceivable
2.2.1	Timing Adjustable	A	9.2.2.1	Operable
2.4.1	Bypass Blocks	A	9.2.4.1	Operable
2.4.2	Page Titled	A	9.2.4.2	Operable
2.4.3	Focus Order	A	9.2.4.3	Operable
2.4.4	Link Purpose (In Context)	A	9.2.4.4	Operable
2.4.5	Multiple Ways	AA	9.2.4.5	Operable
2.4.6	Headings and Labels	AA	9.2.4.6	Operable
2.4.7	Focus Visible	AA	9.2.4.7	Operable
3.1.1	Language of Page	A	9.3.1.1	Understandable
3.1.2	Language of Parts	AA	9.3.1.2	Understandable
3.2.2	On Input	A	9.3.2.2	Understandable
3.3.1	Error Identification	A	9.3.3.1	Understandable
3.3.2	Labels or Instructions	A	9.3.3.2	Understandable
3.3.3	Error Suggestion	AA	9.3.3.3	Understandable
4.1.1	Parsing	A	9.4.1.1	Robust
4.1.2	Name, Role, Value	A	9.4.1.2	Robust

Table 2.3.1 *Siteimprove Automated Testing WCAG Criteria Mapping*

2.3.2 Simplified Monitoring Accessibility Needs Mapping Table

Table 2.3.2 lists how each WCAG criteria which Siteimprove is able to assess programmatically maps to the disability needs as listed in *Annex I*, *Subsection 1.3.2* of the *COMMISSION IMPLEMENTING DECISION (EU) 2018/1524*.

- **V** - Usage without Vision
- **LV** - Usage with Limited Vision
- **C** - Usage without Perception of Colour
- **H** - Usage without Hearing
- **LH** - Usage with Limited Hearing
- **VC** - Usage without Vocal Capability
- **MS** - Usage with Limited Manipulation or Strength
- **PST** - The Need to minimise Photosensitive Seizure Triggers
- **LC** - Usage with Limited Cognition

WCAG Criteria	Criteria Name	V	LV	C	H	LH	VC	MS	PST	LC
1.1.1	Non-text Content	X	X	-	X	X	-	-	-	X
1.2.1	Audio-only and Video-only (Prerecorded)	X	X	-	X	X	-	-	-	X
1.2.2	Captions (Prerecorded)	-	-	-	X	X	-	-	-	X
1.2.3	Audio Description or Media Alternative (Prerecorded)	X	X	-	-	-	-	-	-	X
1.2.4	Captions (Live)	-	-	-	X	X	-	-	-	X
1.2.5	Audio Description (Prerecorded)	X	X	-	-	-	-	-	-	X

1.3.1	Info and Relationships	X	X	-	-	-	-	-	-	X
1.4.1	Use of Color	X	X	X	-	-	-	-	-	X
1.4.2	Audio Control	X	-	-	-	X	-	-	-	X
1.4.3	Contrast (Minimum)	-	X	X	-	-	-	-	-	-
1.4.5	Images of Text	-	X	-	-	-	-	-	-	X
2.2.1	Timing Adjustable	X	X	-	-	-	-	X	-	X
2.4.1	Bypass Blocks	X	X	-	-	-	-	X	-	X
2.4.2	Page Titled	X	X	-	-	-	-	X	-	X
2.4.3	Focus Order	X	X	-	-	-	-	X	-	X
2.4.4	Link Purpose (In Context)	X	X	-	-	-	-	X	-	X
2.4.5	Multiple Ways	X	X	-	-	-	-	X	-	X
2.4.6	Headings and Labels	X	X	-	-	-	-	X	-	X
2.4.7	Focus Visible	-	X	-	-	-	-	X	-	X
3.1.1	Language of Page	X	X	-	X	X	-	-	-	X
3.1.2	Language of Parts	X	X	-	X	X	-	-	-	X
3.2.2	On Input	X	X	-	-	-	-	-	-	X
3.3.1	Error Identification	X	X	X	-	-	-	-	-	X
3.3.2	Labels or Instructions	-	X	-	-	-	-	-	-	X
3.3.3	Error Suggestion	X	X	-	-	-	-	X	-	X
4.1.1	Parsing	X	-	-	-	-	-	X	-	X
4.1.2	Name, Role, Value	X	X	-	-	-	-	X	-	X

Table 2.3.2 *Accessibility Needs Mapping*

2.3.3 In-Depth Website Monitoring Methods

The In-Depth website monitoring method is carried out by the MCA with the support of FITA.

FITA has been operating in the digital accessibility sector for over 20 years. Through their day-to-day operations they assist persons with disabilities in the selection, acquisition, or use of assistive technology that is intended to maintain or improve the individual's quality of life. FITA also provides consultancy services related to the implementation of ICT Accessibility and web accessibility tools. The MCA has found FITA's expertise, services, and experience in the ICT disability sector to be essential for the In-Depth monitoring of websites and mobile applications. FITA primarily relies on manual testing processes, usability tests, and other specialised approaches. Perhaps most importantly, this testing process is conducted by persons with different disabilities.

A mix of automated testing tools and manual checks are used to perform the In-depth website monitoring processes. The set of WCAG criteria to be assessed, which cover all four accessibility principles as set in the requirements of *Article 4 of Directive (EU) 2016/2102* and the overarching EN 301 549 standard are used as the basis for assessment. The criteria for the In-Depth website monitoring method are listed in *Table 2.3.3*.

Table 2.3.3 lists how each WCAG criteria chosen for the In-Depth website monitoring method maps to the WCAG conformance level, the EN 301 549 standard and accessibility principle*.

WCAG Criteria	**Criteria Name**	**WCAG Conformance Level**	**EN Standard Mapping**	**Principle**
1.1.1	Non-text Content	A	9.1.1.1	Perceivable
1.2.1	Audio-only and Video-only (Prerecorded)	A	9.1.2.1	Perceivable
1.2.2	Captions (Prerecorded)	A	9.1.2.2	Perceivable
1.2.3	Audio Description or Media Alternative (Prerecorded)	A	9.1.2.3	Perceivable
1.2.4	Captions (Live)	AA	9.1.2.4	Perceivable
1.2.5	Audio Description (Prerecorded)	AA	9.1.2.5	Perceivable
1.3.1	Info and Relationships	A	9.1.3.1	Perceivable
1.3.2	Meaningful sequence	A	9.1.3.2	Perceivable
1.3.3	Sensory Characteristics	A	9.1.3.3	Perceivable
1.3.4	Orientation	AA	9.1.3.4	Perceivable
1.3.5	Identify Input Purpose	AA	9.1.3.5	Perceivable
1.4.1	Use of Color	A	9.1.4.1	Perceivable
1.4.2	Audio Control	A	9.1.4.2	Perceivable
1.4.3	Contrast (Minimum)	AA	9.1.4.3	Perceivable
1.4.4	Resize Text	AA	9.1.4.4	Perceivable

1.4.5	Images of Text	AA	9.1.4.5	Perceivable
1.4.10	Reflow	AA	9.1.4.10	Perceivable
1.4.11	Non-text Contrast	AA	9.1.4.11	Perceivable
1.4.12	Text Spacing	AA	9.1.4.12	Perceivable
1.4.13	Content on hover or focus	AA	9.1.4.13	Perceivable
2.1.1	Keyboard	A	9.2.1.1	Operable
2.1.2	No Keyboard Trap	A	9.2.1.2	Operable
2.1.4	Character Key Shortcuts	A	9.2.1.4	Operable
2.2.1	Timing Adjustable	A	9.2.2.1	Operable
2.2.2	Pause, Stop, Hide	A	9.2.2.2	Operable
2.3.1	Three Flashes or Below Threshold	A	9.2.3.1	Operable
2.4.1	Bypass Blocks	A	9.2.4.1	Operable
2.4.2	Page Titled	A	9.2.4.2	Operable
2.4.3	Focus Order	A	9.2.4.3	Operable
2.4.4	Link Purpose (In Context)	A	9.2.4.4	Operable
2.4.5	Multiple Ways	AA	9.2.4.5	Operable
2.4.6	Headings and Labels	AA	9.2.4.6	Operable
2.4.7	Focus Visible	AA	9.2.4.7	Operable
2.5.1	Pointer Gestures	A	9.2.5.1	Operable
2.5.2	Pointer Cancellation	A	9.2.5.2	Operable
2.5.3	Label in Name	A	9.2.5.3	Operable
2.5.4	Motion Actuation	A	9.2.5.4	Operable
3.1.1	Language of Page	A	9.3.1.1	Understandable
3.1.2	Language of Parts	AA	9.3.1.2	Understandable
3.2.1	On Focus	A	9.3.2.1	Understandable
3.2.2	On Input	A	9.3.2.2	Understandable
3.2.3	Consistent Navigation	AA	9.3.2.3	Understandable
3.2.4	Consistent Identification	AA	9.3.2.4	Understandable
3.3.1	Error Identification	A	9.3.3.1	Understandable
3.3.2	Labels or Instructions	A	9.3.3.2	Understandable
3.3.3	Error Suggestion	AA	9.3.3.3	Understandable
3.3.4	Error Prevention (Legal, Financial, Data)	AA	9.3.3.4	Understandable
4.1.1	Parsing	A	9.4.1.1	Robust
4.1.2	Name, Role, Value	A	9.4.1.2	Robust
4.1.3	Status Messages	AA	9.4.1.3	Robust

Table 2.3.3 *In-Depth Testing WCAG Criteria Mapping*

**It shall be noted that a single criterion can address multiple accessibility principles. Hence whilst this is not evident in the above mapping table, in some instances manual testing allowed for multiple principles to be tested for a single criterion. For instance, in criterion 1.1.1 Non Text Content, apart*

from the perceivable principle, any affected website content was also tested for operability and being understandable for all users.

2.3.4 Automated Tools Used for In-Depth Website Testing

The MCA prides itself on implementing a predominantly, if not entirely, manual approach to In-Depth monitoring, conducted by individuals representing diverse disabilities.

Nevertheless, even though reduced to a bare minimum, automated tools have been employed in select cases to evaluate websites for specific non-compliant criteria. Following these automated tests, manual assessments were still performed to confirm and double check the results.

The automated tools being deployed in the In-Depth assessments are:-

a) **WCAG Colour Contrast Checker** – The WCAG Colour Contrast Checker helps identify whether foreground and background colour in relation to text achieve conformance.

WCAG Criteria	Criteria Name
1.4.3	Contrast (minimum)

Table 2.3.4 *Criteria Tested Using WCAG Colour Contrast Checker*

b) **WAVE -** WAVE is a suite of evaluation tools that helps authors make their web content more accessible to individuals with disabilities. WAVE can identify many accessibility and WCAG errors, and also facilitates human evaluation of web content.

WAVE was used to test the criteria listed in *Table 2.3.5.*

WCAG Criteria	Criteria Name
1.1.1	Non-text content
1.2.2	Captions (pre-recorded)
1.4.3	Contrast (minimum)
2.4.1	Bypass blocks
2.4.4	Link purpose (in context)
2.4.6	Headings and labels
3.1.1	Language of page
3.1.2	Language of parts
4.1.2	Name, role, value

Table 2.3.5 *Criteria Tested Using WAVE*

2 *In-Depth Website Monitoring Manual Accessibility Checks*

Most of the criteria listed in *Table 2.3.3* were tested using manual checks without making use of automated tools. Different assistive technology applications were used by the testing personnel to perform these checks. In accordance with the Directive's guidelines, individuals with disabilities primarily conducted these manual checks, aided by a sighted individual to ensure comprehensive coverage of their particular requirements during testing.

a) **JAWS –**JAWS is a screen reader developed for computer users whose vision loss prevents them from seeing screen content or navigating with a mouse. Using JAWS, persons with visual disabilities can navigate the Internet, write a document, read an email and create presentations.
b) **NDVA -** NVDA allows blind and vision impaired people to access and interact with the Windows operating system and many third party applications.
c) **Keyboard Use –** Where applicable, the criteria were tested using the exclusive use of keyboard.

Table 2.3.9 lists the criteria which were manually assessed using one or more of the above mentioned assistive technologies without using automated tools.

WCAG Criteria	Criteria Name	WCAG Conformance Level	EN Standard Mapping	Principle
1.1.1	Non-text Content	A	9.1.1.1	Perceivable
1.2.2	Captions (Prerecorded)	A	9.1.2.2	Perceivable
1.3.1	Info and Relationships	A	9.1.3.1	Perceivable
1.3.2	Meaningful sequence	A	9.1.3.2	Perceivable
1.3.5	Identify Input Purpose	AA	9.1.3.5	Perceivable
1.4.4	Resize Text	AA	9.1.4.4	Perceivable
1.4.11	Non-text Contrast	AA	9.1.4.11	Perceivable
1.4.12	Text Spacing	AA	9.1.4.12	Perceivable
2.1.1	Keyboard	A	9.2.1.1	Operable
2.1.2	No Keyboard Trap	A	9.2.1.2	Operable
2.2.2	Pause, Stop, Hide	A	9.2.2.2	Operable
2.4.1	Bypass Blocks	A	9.2.4.1	Operable
2.4.3	Focus Order	A	9.2.4.3	Operable
2.4.4	Link Purpose (In Context)	A	9.2.4.4	Operable
2.4.5	Multiple Ways	AA	9.2.4.5	Operable
2.4.6	Headings and Labels	AA	9.2.4.6	Operable
2.4.7	Focus Visible	AA	9.2.4.7	Operable
2.5.3	Label in Name	A	9.2.5.3	Operable
3.1.1	Language of Page	A	9.3.1.1	Understandable
3.1.2	Language of Parts	AA	9.3.1.2	Understandable
3.2.1	On Focus	A	9.3.2.1	Understandable
3.2.3	Consistent Navigation	AA	9.3.2.3	Understandable
3.2.4	Consistent Identification	AA	9.3.2.4	Understandable
4.1.2	Name, Role, Value	A	9.4.1.2	Robust
4.1.3	Status Messages	AA	9.4.1.3	Robust

Table 2.3.9 *Criteria checked manually only*

3 In-Depth Website Monitoring Targeted Disabilities

The assessed criteria as part of the In-Depth website monitoring process aimed to target a wide range of disabilities. *Table 2.3.10* lists which disability each assessed criteria targeted. The amount of disabilities targeted for each criteria was only made possible by using a combination of automated and manual tests by persons with disabilities. As mentioned in *Subsection 2.3.2.II*, usability testing was also added on top of manual testing for a more comprehensive approach.

- V - Vision
- D - Deaf
- M - Mobility
- I - Intellectual
- H – Hidden

WCAG Criteria	Criteria Name	V	D	M	I	H
1.1.1	Non-text Content	X	-	X	-	-
1.2.1	Audio-only and Video-only (Pre-recorded)	X	X	X	-	-
1.2.2	Captions (Pre-recorded)	X	X	X	-	-
1.2.3	Audio Description or Media Alternative (Pre-recorded)	X	X	X	-	-
1.2.4	Captions (Live)	X	X	X	-	-
1.2.5	Audio Description (Pre-recorded)	X	X	X	-	-
1.3.1	Info and Relationships	X	-	X	-	-
1.3.3	Meaningful Sequence	X	-	X	-	-
1.3.3	Sensory Characteristics	X	X	X	-	-
1.3.4	Orientation	-	X	X	X	-
1.3.5	Identify Input Purpose	X	-	-	X	-
1.4.1	Use of Colour	-	-	X	-	-
1.4.2	Audio Control	X	-	X	-	-
1.4.3	Contrast (Minimum)	X	-	X	-	-
1.4.4	Resize text	X	-	X	-	-
1.4.5	Images of Text	X	-	X	-	-
1.4.10	Reflow	X	X	X	X	-
1.4.11	Non-text Contrast	X	X	X	X	-
1.4.12	Text Spacing	-	X	X	X	-
1.4.13	Content on hover or focus	X	-	X	-	X
2.1.1	Keyboard	X	-	X	-	-
2.1.2	No Keyboard Trap	X	-	X	-	-
2.1.4	Character Key Shortcuts	X	-	X	-	-
2.2.1	Timing Adjustable	X	-	X	X	-
2.2.2	Pause, Stop, Hide	X	-	X	-	-
2.3.1	Three Flashes or Below Threshold	X	-	X	-	X

2.4.1	Bypass Blocks	X	-	X	-	-
2.4.2	Page Titled	X	-	-	-	-
2.4.3	Focus Order	X	-	X	-	-
2.4.4	Link Purpose (In Context)	X	-	X	-	-
2.4.5	Multiple Ways	X	-	X	X	-
2.4.6	Headings and Labels	X	-	X	X	-
2.4.7	Focus Visible	X	-	X	X	-
2.5.1	Pointer Gestures	-	-	X	X	-
2.5.2	Pointer Cancellation	-	-	X	X	-
2.5.3	Label in Name	X	-	-	X	-
2.5.4	Motion Actuation	X	-	X	-	-
3.1.1	Language of Page	X	X	X	X	-
3.1.2	Language of Parts	X	X	X	X	-
3.2.1	On Focus	X	-	X	X	-
3.2.2	On Input	X	-	X	X	-
3.2.3	Consistent Navigation	X	-	X	X	-
3.2.4	Consistent Identification	X	-	X	X	-
3.3.1	Error Identification	X	-	X	X	-
3.3.2	Labels or Instructions	X	-	X	X	-
3.3.3	Error Suggestion	X	-	X	X	-
3.3.4	Error Prevention (Legal, Financial, Data)	X	-	X	X	-
4.1.2	Name, Role, Value	X	-	X	-	-
4.1.3	Status Messages	X	-	X	-	-

Table 2.3.10 *In-Depth Website Monitoring Disability Mapping*

4 In-Depth Mobile Application Monitoring Methods

The In-Depth mobile application monitoring is mainly carried out using manual testing methods with the help of end-user assistive technologies. This is largely because testing tools that can be used to assess mobile applications are still very limited at present and therefore, mobile applications testing is heavily based on manual testing. While the monitoring process involves extensive manual testing, the same criteria evaluated through the In-Depth website monitoring method are also applied to mobile applications. This approach ensures that all four accessibility principles as set in the requirements of *Article 4 of Directive (EU) 2016/2102* and the EN 301 549 standard are used as the basis for assessment. The criteria assessed in the mobile applications method are listed in *Table 2.3.3.*

Similarly to the In-Depth websites monitoring method, the mobile applications monitoring method is carried out by the MCA with the support of FITA.

5 Automated Tools Used for In-Depth Mobile Application Testing

The only automated tool used in this method is the Accessibility Scanner mobile application by Google. It is used to automatically detect contrast issues in mobile applications. Since this tool is only available on Android devices, manual checks were conducted for iOS-based systems instead.

6 In-Depth Mobile Application Monitoring Manual Accessibility Checks

As per *Subsection 2.3.1.III,* the monitoring method for mobile applications is mainly carried out using manual tests with the help of assistive technologies;-

a) **VoiceOver and Talkback –** The VoiceOver and TalkBack assistive tools are the native text to speech applications found on iOS and Android devices respectively. These tools are used as part of the manual testing process to ensure that the visual information and content found within the mobile application can also be communicated via text to speech applications or other assistive technologies.

b) **Gesture functions in magnification mode –** The magnification feature found natively on mobile devices is used to test whether the mobile application is still usable in a magnified state.

The assistive technologies are applied to each assessed criterion, where applicable.

7 In-Depth Mobile Application Monitoring Targeted Disabilities

Since the same criteria are assessed using the In-Depth website and mobile application monitoring methods, the same set of disabilities are also targeted through these criteria. Manual checks are used to replace the automated tools used in the website monitoring method and ensure the same number of disabilities are targeted for each criterion. *Table 2.3.10* lists which disability each assessed criteria targeted.

2.3.5 Testing Processes Checks and Usability Testing

I. Simplified Website Monitoring Processes

a) WCAG Criteria Testing – Using Siteimprove's accessibility checker tool as mentioned in *Subsection 2.3.1.I* -

The MCA conducts automated tests on all of the websites in the simplified monitoring sample to check for non-conformance with WCAG Standards.

The sample of pages selected from each public sector website typically includes:

1. Home Page
2. About Us Page
3. Contact Us Page
4. Two or more second-level pages within the website
5. If applicable, a PDF file found within the website

These pages are selected to provide a representative sample of the website's content and design features. By using an automated tool to test these pages for WCAG non-conformities, the MCA can efficiently identify accessibility issues and prioritise necessary improvements to ensure public sector websites are accessible to all users, including those with disabilities.

The MCA prioritises the selection of pages that are particularly crucial, such as the contact page, and tries to also include pages with specific content, such as videos or registration forms. For each page in the sample, Siteimprove tests all the criteria listed in Table 3.2.1

b) Accessibility Statement Compliance Checks - The manual check conducted for each website in the simplified monitoring sample aims to determine whether the public sector body being monitored has a WAD compliant accessibility statement. This manual assessment focuses on identifying areas of non-compliance in the accessibility statement, which typically include:

- The accessibility statement is easily accessible from all the website pages.
- The accessibility statement provides suitable contact information.
- The accessibility statement is current and has been updated within the past year.
- The accessibility statement contains the required information as mentioned in Article 7 of Directive (EU) 2016/2102.
    - Accessibility nonconformities have been clearly explained and where appropriate, the accessible alternatives provided.
    - A description of, and a link to, a feedback mechanism enabling any person to notify the public sector body concerned of any failure of its website to comply with the accessibility requirements.
    - The MCA also requires public sector bodies to include a link to the enforcement procedure that may be resorted to if the response to any particular request is unsatisfactory.
    - The accessibility statement, where applicable, provides additional instructions related to any accessibility features or tools used within the website.

c) **PDF File Assessment** – When available, the MCA also assesses PDF files for accessibility issues. This evaluation encompasses several key accessibility features to ensure that PDF documents are accessible to all, including users with disabilities. The assessment includes:

- **Document Language**: Verifying that the document language is properly specified within the PDF file, ensuring compatibility with screen readers and other assistive technologies.
- **Titles and Headers**: Checking that proper titles and headings are consistently used throughout the document's structure to support navigation and understanding for users with disabilities.
- **Form Elements**: Assessing the accessibility of form elements within the PDF, such as text fields, checkboxes, radio buttons, and dropdown menus, to ensure they are properly labelled and accessible to assistive technologies.
- **Bookmarks**: Verifying the presence of bookmarks within the PDF document to facilitate navigation for users with disabilities, allowing them to quickly jump to different sections or headings.
- **Tags**: Ensuring that the PDF document is properly tagged to provide structural information to assistive technologies, improving navigation and comprehension for users with disabilities.

Following the simplified monitoring testing results for each website in the sample, a report highlighting the WCAG non-conformities and accessibility statement compliance is compiled by the MCA and forwarded to the respective public sector body. *Subsection 2.3.2.I - Simplified Website Monitoring Report Structure* outlines the structure of the report sent to the public sector bodies once their website is assessed.

Simplified Website Monitoring Report Structure

The simplified monitoring report sent to the public sector bodies is structured as per the following sections.

1. Executive Summary
2. Scope of Evaluation
3. Review Team
4. Accessibility Statement
5. Results and next steps
    1) Areas of compliance
    2) Areas of non-compliance
    3) Timeline for rectification of non-compliance
    4) Current level of compliance
6. Description of WCAG criteria including suggested fixes for identified issues
7. PDF File Assessment
8. Annex 1 – Output of Issues Report

Details on the simplified monitoring outcomes can be found in *Section 3* of this report.

In-Depth Website Monitoring Processes

a) **WCAG Criteria Testing –** As mentioned in *Subsection 2.2.3.II*, a combination of automated tests and manual checks are carried out to test the websites for WCAG criteria non-compliance using the In-Depth method.

   Both the automated and manual tests are based on a sample of pages from each website in the In-Depth monitoring sample.

   Each sample of pages consists of the following pages (where available) as specified in *Annex I, Subsection 3.2 of the COMMISSION IMPLEMENTING DECISION (EU) 2018/1524*;

   - Home Page
   - Login Page (where applicable)
   - Sitemap
   - Accessibility Statement Page
   - About us page
   - Contact Us page
   - Publications
   - News
   - Legal Information Page
   - At least one relevant page for each type of service provided by the website.
   - A page having a substantially distinct appearance or presenting a different type of content.
   - A downloadable document related to the services being offered by the website.
   - Other randomly selected pages for larger websites. *
   - Other pages deemed to be relevant to the sample for this exercise.

   **A larger sample of pages is taken for larger and more complex websites and based on the testers' experience, the In-Depth monitoring processes is extended to other pages as required.*

b) **Automated WCAG Criteria Testing –** The automated testing process is carried out on each page in the sample using the tools as described in *Subsection 2.3.1.II* of this report.

c) **Manual WCAG Criteria Testing –** The manual testing process is carried out on each page in the sample using the methods described in *Subsection 2.3.1.II* of this report.

d) **Additional Testing -** The In-Depth monitoring method, where possible and / or applicable, evaluates the user's journey in relation to the use of forms and other interactive dialogue objects to confirm that the expected prompts and feedback are in-line with the accessibility requirements.

e) **Usability Testing –** During the In-Depth monitoring process, where applicable, in addition to the automated and manual tests, various usability considerations are made and assessed accordingly. Depending on the criteria being assessed, different accessibility aspects are included in the tests. *Table 2.3.11* lists these WCAG criteria and which usability considerations are taken for each instance.

WCAG Criteria	Criteria Name	Usability Consideration
1.1.1	Non-text Content	Text length
1.2.2	Captions (Pre-recorded)	Text legibility, quality and timing
1.3.1	Info and Relationships	Screen clutter
1.3.3	Sensory Characteristics	Timing and prominence
1.4.2	Audio Control	Ease of use
2.1.1	Keyboard	Menu length
2.2.1	Timing Adjustable	Ease of use
2.2.2	Pause, Stop, Hide	Ease of use
2.4.5	Multiple Ways	Ease of use
2.4.6	Headings and Labels	Mapping of content structure and relevance
3.2.3	Consistent Navigation	Conformity to user expectations

Table 2.3.11 *Usability Considerations*

f) **Accessibility Statement Compliance Checks -** For each website in the In-Depth monitoring sample, a manual check is carried out to determine whether the public sector body being monitored has a WAD compliant accessibility statement or not. The manual accessibility statement checks for In-Depth monitored websites follow the same process as defined in *Subsection 2.3.2.1*.

Following the In-Depth monitoring testing results for each website in the sample, a report highlighting the non-conformities, accessibility statement compliance, usability feedback and other relevant feedback is compiled and forwarded to the respective public sector body. The below outlines the structure of the report sent to the public sector bodies once their website is assessed.

In-Depth Website Monitoring Report Structure

The In-Depth website monitoring report sent to the public sector bodies is structured as follows:

1. Executive Summary
2. Scope of the assessments
3. Sample Pages/Functionality assessed
4. Summary and Rating
5. Identified issues as per EN 301 549
6. Infringements to Standard EN301549
7. Accessibility Statement
8. Timeline for rectification of non-compliance
9. Appendix A – Issues
10. Appendix B – Screenshot
11. Appendix C – User Rating

Details on the In-Depth monitoring outcomes can be found in section 3 of this report.

II. In-Depth Mobile Applications Monitoring Testing Processes

In-Depth Mobile Applications Monitoring Testing Processes

a) **WCAG Criteria Testing –** The sample of pages (screens) used for the In-Depth mobile application monitoring consists of the same or similar pages as specified in Subsection 2.3.2.II. Extensive manual work is involved in this case to test the criteria as detailed in section 2.3.2.II.
b) **Usability Testing –** During the In-Depth mobile applications monitoring process, where applicable, in addition to the automated and manual tests, various usability considerations are made and assessed. Depending on the criteria being assessed, different accessibility aspects are included in the tests. *Table 2.3.12* lists these WCAG criteria and which usability considerations are taken for each instance.

WCAG Criteria	Criteria Name	Usability Consideration
1.1.1	Non-text content	Clear image descriptions
1.4.2	Audio control	Easily accessible
2.1.1	Keyboard	Element operability
2.2.2	Pause, stop, hide	Ease of use / Available
2.4.5	Multiple ways	Ease of use
2.4.6	Headings and labels	Mapping of content structure and relevance
1.2.2	Captions (pre-recorded)	Text legibility, quality, and timing
3.2.3	Consistent navigation	Conformity to user expectations
3.2.4	Consistent identification	Icon /button labels, placement, size and function
1.3.1	Info and relationships	Element conjunctions

***Table 2.3.12** Usability Considerations*

Accessibility Statement Compliance Checks

For each mobile application in the In-Depth monitoring sample, a manual check is carried out to determine whether the mobile application being monitored has a WAD compliant accessibility statement or not. The manual accessibility statement checks for In-Depth monitored mobile applications follow the same process as defined in *Subsection 2.3.2.1*.

Mobile Apps In-Depth Website Monitoring Report Structure

The In-Depth Mobile Application monitoring report sent to the public sector bodies is structured as follows:

12. Executive Summary
13. Scope of the assessments
14. Sample Pages/Functionality assessed.
15. Summary and Rating
16. Identified issues as per EN 301 549
17. Infringements to Standard EN301549
18. Accessibility Statement
19. Timeline for rectification of non-compliance
20. Appendix A – Issues
21. Appendix B – Screenshot
22. Appendix C – User Rating

In-Depth Mobile Applications Monitoring Testing Processes

1. The In-Depth monitoring process begins by evaluating the application's screens to determine which are most relevant. Testers then implement screen readers such as TalkBack for Android and VoiceOver for iOS.
2. Nonvisual users conduct the testing, guided by visual users to help identify obstacles and difficulties arising from WCAG non-compliance issues.
3. A report documents all issues found, categorising them by screen and dividing the sections into screen reader and colour contrast issues in Appendix A.
4. Appendix B includes screenshots to visually represent several issues, providing more detailed explanations. The report concludes with Appendix C, which contains a user rating score that reflects the testers' experiences whilst navigating the different screens.
5. A scoring sheet measures all issues found in the report, including the accessibility statement rating and user ratings. The number of pages tested is also considered. The final score determines if the application is accessible.
6. The website owners will be given 6 months' time from when the relevant report is published, to amend the issues.

Frequent Non-Compliant Mobile Applications WCAG Criteria's

WCAG Criteria	WCAG Criteria Name	Percentage of non-compliant apps
2.4.3	Focus Order	25.99%
1.4.3	Contrast (Minimum)	22.47%
4.1.2	Name, Role, Value	13.66%
1.1.1	Non-Text Content	12.33%
2.5.3	Label in Name	10.57%
2.4.6	Heading and Label	7.93%
2.1.1	Keyboard	3.96%
4.1.3	Status Message	3.08%

Frequent In-Depth Non-Compliance Criteria.

a. **Focus Order –** This criterion faced significant compatibility issues. Elements were frequently not highlighted in a logical sequence. Sometimes, the highlighted focus detected elements not currently visible on the selected screen, but rather on underlying screens or in previously viewed slides. Additionally, there were instances of repetitive focus, which could potentially distract or confuse users.

b. **Contrast (Minimum)** – In multiple mobile applications tested, sections containing text meant to convey information failed to meet the required contrast ratio between the foreground and background. This insufficient contrast can make the text difficult to read, potentially hindering users, especially those with visual impairments, from accessing essential information. Improving the contrast ratio is crucial to ensure readability and accessibility for all users.

c. **Name, Role, Value –** This criterion ensures that software, including assistive technologies like screen readers, can identify the name and role of elements. However, during mobile application testing, various elements were found to have empty values, making navigation difficult for users relying on these technologies.

d. **Non-text content –** While images are not frequently used in many mobile applications, their presence is often accompanied by a significant issue: most of these images lack Alt text descriptions. Alt text is crucial as it provides a textual description of the image's content, which is essential for users who rely on screen readers or have visual impairments.

e. **Label in name –** All labels must align precisely with how the screen reader reads them to the user. If there are mismatched labels, it can lead to user confusion, causing them to believe they are interacting with different content than intended. This confusion can disrupt the user's experience, making it harder for them to navigate and understand the application. Consistent labelling ensures clarity and a seamless experience for users relying on screen readers.

f. **Headings and labels –** Heading hierarchy is rarely observed in mobile elements. For users depending on screen readers, the structure of the screen is crucial for comprehension. Heading hierarchy assists users in understanding the number of headings and their respective sections. Each heading should be assigned a specific level, starting with H1 for the main title and descending through H2 to H6 for subheadings.

g. **Keyboard –** An issue observed was that certain elements were inaccessible to users because the screen reader did not have received focus on them. This lack of focus meant users could not interact with those elements as intended.

h. **Status message –** A rare finding in mobile application testing is the absence of status messages that indicate when actions are activated, especially in dropdowns and filter sections. There are no prompts or sounds to notify users when an action has been completed.

3. OUTCOME OF THE MONITORING

3.1. Detailed outcome

Each monitoring method provides unique insights into the accessibility of public sector websites and mobile applications, as guided by the WCAG and EN standards. These methods help identify areas of compliance as well as those needing improvement in accessibility features and best practices.

When using a simplified monitoring approach, it was observed that normally, most public sector websites and mobile applications were partly accessible. However, frequent minor non-conformities were identified. This suggests that while major accessibility barriers may have been addressed, ongoing maintenance and attention is needed to resolve smaller issues that could affect the user experience particularly for individuals with disabilities.

It is worth noting that even before the introduction of the WAD, Government had been advocating for the procurement and use of accessible technologies for several years. This proactive stance likely contributed to the relatively adequate state of website accessibility in the public sector. Government's proactive approach to improving web accessibility is an ongoing process, reflected in significant investments in new platforms, templates, and infrastructures. Recently in fact, a major investment by Government saw the creation of a Managed WordPress Shared Hosting Platform (**WoPHoP**) a project driven by the Malta Information Technology Agency (MITA) and which, to date, already hosts some 200 Public Sector websites.

About MITA

MITA is the public entity vested with the responsibility to provide ICT infrastructure, systems and services to Government that leverage a modern digital ecosystem and contribute towards the definition and execution of the Government’s digital strategies that sustain a modern digital economy.

MITA, through the direction of the Office of the Prime Minister, collaborates with the Office of the Principal Permanent Secretary and Ministry CIOs to attain its mandated strategies and assigned projects.

The Agency is dedicated in assisting Government in transforming technological innovations into real business solutions. Its unique approach combines an innovative array of ICT and project management services with focused delivery capabilities using tried and tested methodologies to help fulfil Government’s strategies and projects and maximise the benefits of investment in technology.

MITA operates within a defined national ICT strategy, prioritising national ICT targets and embraces open standards and technologies as a matter of policy. The Agency builds, nurtures and sustains excellent industry relations both locally and internationally.

About WoPHoP

The MITA Managed WordPress Shared Hosting Platform (WoPHoP) is based on the concept of Shared Hosting and is intended to host public facing content management sites of the Public Service and Public Sector of the Government of Malta.

The MITA Managed WordPress Shared Hosting Platform provides features and tools that are needed to build and publish WordPress based portals. The fully MITA Managed hosting model is being adopted to introduce the concept of Business as a Service (BaaS) in web hosting. This means that MITA, as the technology arm of the Government of Malta, will focus on the technology layer, and hence allow clients to fully focus on the business aspect with full control over the website content.

This approach brings several advantages, namely:

- Maximisation of potential of all stakeholders, as each will be focusing on their strengths.
- Reduction in development effort by providing transparency to portal creators.
- Lesser time to market, as the focus will shift away from technology.

Being a Shared Platform on the other hand is the simplest and most cost-effective way to achieve all these benefits whilst taking advantage of economies of scale. This method is also popular within the web hosting industry as it provides the highest flexibility whilst balancing out costs. MITA shall also be providing a set of pre-approved plugins and a starter theme, with pre-defined layouts, that will augment the hosting service offering. Throughout this process, the MCA has engaged in extensive testing of prototype ministerial websites and ongoing discussions to develop a basic accessible by default template. This template aims to ensure a consistent standard of accessibility across ministerial and departmental websites. As of December 2024, this work remains in progress. This has been a significant investment which testifies the commitment and dedication of the Maltese Government to prioritising web accessibility. Whilst acknowledging that this is an ongoing endeavour, notable progress has been observed across a majority of websites, leading to an overall enhancement of accessibility standards.

Other Considerations

The websites assessed through the In-Depth monitoring method showed some similarities to those assessed using the simplified monitoring method. However, criteria benefiting from manual assessments, particularly those related to context, were more evident. A small number of these websites were found to have quite a poor and unacceptable level of accessibility, primarily, but not entirely, due to the underlying website platform being outdated. Details on the common non-compliant criteria for websites can be found in Subsection 3.1.1.II and Subsection 3.1.2.II.

Through the MCA's direct contact with the public service entities, particularly following a website assessment, it was observed that a few, typically smaller entities, lacked the required human resources needed to maintain an accessible website. In other instances, websites which had been developed in the past and had a change in ownership, were also found to have an increased amount of non-conformities particularly related to content.

In fact, a major challenge lies in maintaining a consistent level of accessibility over time. With multiple content managers continuously adding and removing content, the accessibility level of a website can fluctuate significantly. Such issues, when observed, are discussed with the affected entities accordingly. This is also the main reason why the MCA felt the need to design and deliver specialised training for public sector officials who typically manage the content of these websites.

Accessibility statement compliance was observed to be similar for websites assessed using the simplified and In-Depth monitoring methods. None of the assessed mobile applications to date had a fully compliant accessibility statement.

3.1.1 Simplified Website Monitoring Outcomes

I. WCAG Criteria Compliance Outcomes

In order to analyse the outcomes of the websites using the simplified monitoring method, data from the assessed websites using Siteimprove was collected and compiled into a table. Through Siteimprove's web accessibility checker it was also possible to analyse the individual errors and warnings which resulted in non-compliance.

II. Frequent Non-Compliant WCAG Criteria

A number of criteria were observed which have a high percentage of non-compliance across the sample of assessed websites. The most notable criteria which included frequent non-compliance issues are listed in *Table 3.1.1*. These criteria were found to be non-compliant in 50% or more of the assessed websites.*

**Both errors and warnings were included.*

WCAG Criteria	WCAG Criteria Name	Percentage of non-compliant websites
1.4.3	Contrast (Minimum)	94%
4.1.2	Name, Role, Value	87%
2.4.4	Link Purpose (In Context)	86%
2.4.9	Link Purpose (Link Only)	74%
1.3.1	Info and Relationships	59%
4.1.1	Parsing	56%
1.4.4	Resize Text	51%

Table 3.1.1 Frequent Simplified Monitoring Non-Compliance Criteria.

a) **Contrast (Minimum) –** Colour contrast was the highest observed non-compliant WCAG criteria across the assessed websites. Contrast errors seemed to be frequent due to the lack of awareness regarding accessibility and the recurring use of colour across a website to identify certain areas in a visual manner. Contrast errors were most commonly identified in text areas, headings, titles and links.

b) **Name, Role, Value –** Where controls were present, it was observed that a large number of websites failed to properly implement accessibility measures. The most common error was due to the controls not being labelled appropriately or iFrames missing titles. The majority of websites which did not achieve this criterion also had warnings related to redundant WAI-ARIA attributes.

c) **Link Purpose (In Context) -** Most websites fail the "Link Purpose (in context)" WCAG criterion because they use vague or generic link texts like "Click here" or "Read more," which don't clearly convey where the link will take the user. This lack of clarity, especially for users relying on screen readers or those with cognitive disabilities, makes it difficult to understand the link's purpose without additional context.

d) **Link Purpose (Link Only) -** Websites often fail this criterion because they use vague or repetitive link texts that don't clearly indicate the destination or function when read out of context. This confuses users, especially those using screen readers, as they rely on link text alone to navigate. Additionally, icon-only links without accessible labels contribute to this issue, creating barriers for users with disabilities.

e) **Info and Relationships –** The info and relationships criterion was not achieved by a large number of public sector bodies due to a variety of errors and warnings.

The most common errors observed were;

- Using changes in text presentation to convey information without using the appropriate mark-up or text;
- Incorrectly associating table headers and content via the headers and ID attributes;
- Use of role presentation on content which conveys semantic information; and
- Use of structural mark-up in a way that does not represent relationships in the content.
- Use of ambiguous labels
- Unlabelled content.

f) **Parsing –** A large number of websites had elements whose ID was not unique, which shortcoming was observed repeatedly. It is worth noting that in some cases, the element ID errors were related to third party plug-ins or CMS add-ons used within the website.

g) **Resize Text – It was observed that websites** often fail to support text resizing up to 200% without breaking the layout or losing content. Issues include fixed layouts, non-responsive design, overlapping content, and inflexible CSS that prevents text from scaling properly, leading to poor readability and accessibility for users with visual impairments.

III. Accessibility Statement Testing Outcomes- to update

Through the accessibility statement checks it was observed that the majority (56%) of public sector body websites assessed did not have an accessibility statement. 44% of the websites had an accessible statement whilst 7% had a fully compliant accessibility statement. Common issues with accessibility statement non-compliance included incorrect or missing information, and the location of the accessibility statement being hard to locate or access.

Table 3.1.2 outlines the outcomes of the accessibility statement checks for simplified monitoring.

Accessibility Statement Check Outcome	**Percentage of non-compliant websites**
Accessibility statement not found	56%
Fully compliant accessibility Statement	7%
Non-compliant accessibility statement	37%
Accessibility Statement not easily accessible	0%

Table 3.1.2 Accessibility Statement Check Outcome.

Table 3.1.2 does not include data related to websites assessed during Q3&Q4 2024 due to time constraints in relation to the drafting and publication of this report.

IV. Measurement data

The websites assessed using the simplified monitoring method were each awarded an accessibility score reflecting the results of the tests and checks carried out.

a) This score is calculated manually, with up to 80% allocated based on conformity with WCAG criteria and up to 20% based on the compliance of the accessibility statement. A fully compliant accessibility statement earns the full 20%, a partially compliant statement earns 10%, and no statement results in 0%. This score is intended solely as a general guideline and a metric to track improvement over time. Public sector bodies are requested to use it for internal purposes only and are prohibited from publishing it for public dissemination. **WCAG Criteria Conformity –** The WCAG criteria conformity was scored using Siteimprove's accessibility checker's weighting system. For each criterion listed in *Table 2.3.1*, a score was awarded based on the number of WCAG errors and warnings found. Siteimprove's accessibility checker makes a distinction in score weighting between errors and warnings to distinguish between WCAG success criteria and best practices. Errors are issues which have been automatically determined to be failures that do not achieve the success criteria in WCAG, whilst warnings are issues which have been automatically determined to be failures not in line with best practices in WCAG. The total Siteimprove score for WCAG AA nonconformities was adjusted to be reflected in a percentage score between 0% and 80% for each public sector body website.

b) **Accessibility Statement Compliance** – Based on the findings of the accessibility statement compliance checks, a score between 0% (no accessibility statement found) and 20% (fully compliant accessibility statement) was awarded. Where an accessibility statement was available within the website being monitored and it failed to meet one or more of the criteria mention in *Subsection 2.3.2.I,* a lower score was awarded accordingly.

The overall simplified website accessibility score is included in the monitoring outcomes report sent to the public sector bodies.

3.1.2 In-Depth Website Monitoring Outcomes

I. WCAG Criteria Compliance Outcomes

In order to analyse the outcomes of the websites using the In-Depth monitoring method, data from the assessed websites using both automated tools and manual testing were collected and compiled into a table. Due to the intricate nature of this method, involving a blend of automated and manual processes, websites tended to score lower in usability criteria. Moreover, since In-Depth monitoring was conducted mainly by persons with disability, the MCA allowed for a degree of subjectivity to ensure that the needs of the said persons are captured and reflected in the outcome as much as possible.

Furthermore, In-Depth manual testing enabled the methodology to address false positives commonly encountered in simplified testing. Automated tools can yield false positives, and the in-depth methodology seeks to eliminate or at least mitigate these false positives as part of the more comprehensive in-depth monitoring.

II. Frequent Non-Compliant WCAG Criteria

Several criteria were observed which have a high percentage of non-compliance across the sample of assessed websites. The most notable criteria which included frequent non-compliance issues are listed in *Table 3.1.3.*

The following represent the error percentages in relation to the total number of errors.

WCAG Criteria	WCAG Criteria Name	Percentage from total number of errors
1.4.3	Contrast (minimum)	39.26%
2.4.7	Focus visible	24.32%
4.1.2	Name, Role, Value	12.38%
2.4.4	Link purpose (in context)	8.69%
1.1.1	Non-text content	6.87%
2.1.1	Keyboard	3.89%
2.4.6	Headings and labels	2.81%
1.3.1	Info and Relationships	1.79%

Table 3.1.3 Frequent In-Depth Non-Compliance Criteria.

a. **Contrast minimum -** Colour contrast was the highest observed non-compliant WCAG criteria across the assessed websites. Contrast errors seemed to occur frequently due to the lack of awareness regarding accessibility and the recurring use of colour across a website to identify certain areas visually. Contrast errors were most commonly identified in text areas, headings, titles and links.

b. **Focus Visible –** During website keyboard navigation, a common issue identified in several assessments was the absence of visual border indicators to guide users through the page's content. Implementing visual borders would help users easily identify where the cursor focus is located.

c. **Name, Role, Value –** It was identified that various elements on websites, such as links and form fields, lacked accurate values, which hindered the ability to ascertain the correct information for users. This suggests that users may encounter challenges or inaccuracies when interacting with these elements, potentially impacting their overall experience of the website.

d. **Non-text content –** Accessibility issues related to non-text content were present across the majority of websites assessed. The most common accessibility failure related to images not having alternative text or having incorrect alternative text. Based on feedback received from the public sector bodies, it was evident that there is a lack of awareness regarding images and other non-text content accessibility.

e. **Link purpose -** Links are another common element found within a website. Similarly to use of colour, it was observed that a large number of websites failed to implement accessible links. Based on the feedback received from the public sector bodies, it seems that there is a general lack of awareness regarding links accessibility. The most common accessibility failures included link text being used for multiple different destinations and image links missing alternative text.

f. **Headings and labels –** Throughout the In-Depth assessments, it was observed that a significant number of websites do not make use of descriptive headings. For In-Depth assessments, this criterion is considered mostly for checking the presence of HTML headings. See point h below re. criteria 1.3.1 which is also related.

g. **Keyboard –** Almost half of the assessed websites were not accessible when making use of a keyboard. Common accessibility limitations included:
    i. Menu items not being navigable using keyboard.
    ii. Keyboard Navigation not being highlighted.
    iii. Content on hover state is not reachable with keyboard use.

h. **Info and Relationships –** This criterion is used to check for structure based on how the data is being presented. During In-Depth assessments, it was observed that heading text is rarely meaningful, whereas other aspects within the context being presented still helped users to infer the website's structure. Hence, whilst this criterion was not successful in simplified or automated testing, it did not normally affect manual testing and testers typically still managed to comprehend the content that was being presented.

III. Accessibility Statement Testing Outcomes

When evaluating accessibility statements, it was observed that half (50%) of the assessed public sector body websites did not have an accessibility statement. Conversely, the other half (50%) of the websites had an accessibility statement; however, only 3% were fully compliant with the WAD standards. Additionally, 47% of the assessed websites had an accessibility statement that was difficult to locate or access. Table 3.1.4, titled "Accessibility Statement Check Outcome," provides a more detailed summary of these findings.

Accessibility Statement Check Outcome	**Percentage of non-compliant websites**
Accessibility statement not found	50%
Compliant accessibility Statement	3%
Non-compliant accessibility statement	47%

Table 3.1.4 Accessibility Statement Check Outcome.

IV. Measurement data

The websites assessed in 2022 and 2023 using the In-Depth monitoring method were each awarded an accessibility score reflecting the results of the tests and checks carried out. A maximum of 80% of the score was awarded for WCAG criteria conformity, whilst a maximum of 20% was awarded for accessibility statement compliance.

In 2024, following consultation and discussion with the focus group, the In-Depth scoring methodology was slightly modified to include an additional user experience rating, introduced as a percentage. This adjustment was made to evaluate the practical usability of web content from the perspective of users with disabilities. In fact, the In-Depth assessment, primarily conducted by testers with disabilities, now places significant emphasis on their navigation experience.

Consequently, the revised scoring system now allocates up to 65% of the total score to compliance with the Web Content Accessibility Guidelines (WCAG), up to 20% to the adherence of accessibility statements, and up to 15% to the user experience rating. This modification ensures a more comprehensive assessment that not only measures technical compliance but also the actual usability for persons who rely on accessible design.

The "User Experience" component of the total score is evaluated based on the following factors:

1. Ease of Navigation for Screen Readers
2. Headings and Labelling
3. Alt Text for Images
4. Forms and Interactive Elements
5. Overall UX Experience

Each of the above-mentioned factors is rated on a scale of 1-5, and the average of these ratings is calculated. This average is then converted into 15% of the overall score. The report also includes some comments and suggestions by the testing staff, on each of the above.

V. WCAG Criteria Conformity and Usability Testing Score

The WCAG criteria conformity was scored using a combination of automated tools, manual testing and usability checks. The scoring methodology outlined in this section was used to quantify the severity of the issue and multiple occurrences across a public sector body website into a single value. For each criterion listed in *Table 2.3.2,* a WCAG non-conformity count was assigned as part of the scoring method. Each WCAG non-conformity count was calculated manually based on the WCAG errors, WCAG warnings and usability issues found when assessing the website. WCAG non-conformities which were found to cause substantial accessibility issues and site wide usability issues, were given increased weighting in this scoring method.

VI. Accessibility Statement Compliance Score

Based on the findings of the accessibility statement compliance checks, a score between 0% (no accessibility statement found) and 20% (fully compliant accessibility statement) was awarded. In the event where an accessibility was available within the website being monitored however it failed to meet one or more of the criteria mention in Subsection *2.3.2.II,* a lower score was awarded accordingly.

VII. Ad Hoc Adjustments

In cases where accessibility limitations or usability issues were identified but were not directly captured by WCAG criteria conformity or usability testing scores, manual adjustments were made to the final score. These adjustments were also applied to cater for EN301549 specific requirements. As previously mentioned, the In-Depth monitoring method permitted a higher degree of subjectivity compared to the simplified approach.

This subjectivity was also applied to the scoring methodology, as the MCA sought to ensure that the score reflected, among other factors, the tester's experience rather than solely relying on quantitative measures that may not fully represent real-world website usage. The comprehensive In-Depth website accessibility score was included in the monitoring report provided to the public sector body.

3.1.3 In-Depth Mobile Applications Monitoring Outcomes

I. General Outcomes

Most assessed mobile applications were found to be fairly usable with the help of various assistive technologies, however, a number of shortcomings were also present. The main issue observed throughout the assessment of mobile applications was lack of consistency whereby in most cases, accessibility features such as accessible headings and labels were present on some of the pages but were missing on others. Similar issues related to form buttons were also observed. The inconsistency of accessible features made it difficult to navigate and make

effective use of the mobile applications particularly by persons with disabilities. Other issues which were observed across the mobile applications assessed, although less common, were inaccessible links and minor contrast issues.

A small number of issues were observed which related to specific feature/s of the mobile application being assessed. These included:

a) List items not properly named or numbered;
b) Loading screens without the proper descriptions; and
c) Misleading icons and buttons – this issue was observed both as a labelling issue and as a functional issue.

II. Accessibility Statement Testing Outcomes

None of the mobile applications assessed to date featured an accessibility statement. This may be linked to the small number of assessments carried out to date. Conversely, it is also possible that some entities are not yet aware that mobile applications also require the same level of accessibility as websites. This is expected to improve over time similarly to website based accessibility statements.

III. Measurement data

The mobile applications assessed as part of the In-Depth monitoring method are each awarded an accessibility score using the In-Depth scoring method detailed in *Subsection 3.1.2.IV.* Whilst the same assessment method is used for the In-Depth websites and mobile applications, the actual assessment process on mobile applications was different and more based on manual testing.

This is mostly due to the lack of assessment technologies that are available at present which requires the mobile apps assessments to be carried out in a quasi-fully manual manner. To support this manual process, some assistive technologies, accessibility checking tools used and manual usability checks which are specific to mobile applications, are used as mentioned in *Subsection 2.3.1.III* when and as applicable.

3.1.4 Scoring Outcomes

Based on the scoring methods mentioned above, an accessibility score for each assessed website and mobile application is calculated. The average accessibility score for the simplified website monitoring method for this monitoring period is **72%** whilst the average accessibility score for the In-Depth website monitoring method is of **50%**. The average accessibility score for In-Depth mobile applications is **60%.**

A decline in the average score for comprehensive website monitoring has been noted compared to the previous monitoring period. This decrease is attributed to the recent scoring revisions we have implemented, which aim to better capture the tester's experience beyond basic and binary testing methods. Additionally, as outlined in section 3.1, the introduction of a new shared hosting platform during the 2023-2024 timeframe has also impacted the average score.

These scoring revisions offer a more accurate representation of the assessed entity's website accessibility status. We are already observing a gradual improvement in the accessibility of websites that have been evaluated more recently.

The MCA rescores the assessed websites and mobile apps after a six-month period allocated for rectification. Detailed information about this re-scoring process, including its methodology and outcomes, can be found in Section 3.3.

3.2. Additional content

3.2.1 Observations in different technologies used

I. Website Monitoring

Throughout the website monitoring processes for both the simplified and In-Depth monitoring methods, various elements related to the website's structure and backend design were observed.

Websites using up to date versions of content management systems (CMSs) were frequently found to have accessible templates, although it was common for websites to have accessibility issues due to any customisations that were performed. Third party website plug-ins added on top of the CMS template were also often found to have accessibility issues. In some occurrences it was not technically possible to make third party plug-ins accessible due to the underlying code not being owned by the public sector body.

A small number of websites opted to incorporate accessibility overlays, with magnification tools and colour modification options being the most prevalent. Generally, the MCA advised against the use of these tools; whilst they may assist users with certain disabilities, they are often inaccessible to individuals with other disabilities and frequently lack adequate documentation or usage instructions in the accessibility statement.

In some instances, a large number of accessibility issues were present due to outdated technologies being used by the websites. For instance, a number of public sector websites were still reliant on an outdated Microsoft SharePoint 2013 platform with minimal consideration towards accessibility. Nonetheless, following the website monitoring process, various accessibility issues were identified and successfully addressed.

Results from websites which were heavily reliant on custom code by third party developers were varied. In some instances, accessibility was implemented from the first stages of the website development life cycle which resulted in highly accessible websites, however in various other cases, accessibility features were minimal.

As previously mentioned, the Government of Malta is committed to advancing web accessibility by developing standardised templates that simplify and enhance the creation and management of accessible web content. While these templates will be adopted by most, though not all, public sector websites, improvements are already evident as these templates are being rolled out and implemented. Combined with growing awareness and the continued delivery of specialised training programs for public sector ICT officials, these efforts will further streamline progress toward achieving the ultimate goal of "Accessibility by Design. It is also encouraging to note that the majority of public sector bodies welcomed the monitoring results and co-operated fully in performing the required accessibility changes with the help of their third-party developers.

3.2.2 Lessons learnt from the feedback sent by the monitoring body

Accessibility Knowledge and Feedback

The MCA's personnel working on the Directive significantly enhanced their web accessibility knowledge through the monitoring methods and specific processes applied during the first and second monitoring periods. Despite initial challenges, the MCA developed a methodology that was both fair and comprehensive. Regular use of accessibility tools and manual checks made it easier to identify recurring accessibility issues. The monitoring outcome report, which details each public sector body's compliance, offered valuable insights into individual accessibility criteria and their requirements in a clear and accessible format. Over time, the Authority's staff also became somewhat familiar with the various technologies used by public sector bodies to develop websites.

When communicating with the public sector bodies as part of the notification processes and to address any queries or gaps in the monitoring outcomes reports, the MCA was able to gain a better understanding of web accessibility from the public sector bodies' perspective. Limitations such as budget considerations, pre-existing templates, changes in website ownership and lack of human resources were frequently encountered. Feedback received from the public sector bodies with regards to the monitoring processes and outcome reports was welcomed by the MCA and, where possible, amendments were made to facilitate or improve relevant areas of the monitoring methods.

It is worth noting that the MCA established and maintained a healthy and open relationship with the public sector bodies in terms of website accessibility as all Ministries and the public bodies falling thereunder embraced the initiative and provided the required support.

During the second monitoring period, this relationship has grown even stronger as entities have gained a deeper understanding of the significance of web accessibility and their responsibilities under the Directive.

Web accessibility has become a key priority for the Government of Malta, reflected in substantial financial investments and a steadfast commitment to achieving excellence in this area.

3.2.3 Monitoring Re-Scoring Process

As detailed in Section 3.1.4, each public sector body is assigned an accessibility score during the monitoring process, which is included in the monitoring outcomes report. Public sector bodies are expected to enhance their website's accessibility within a timeframe of six months.

During this period, the MCA addresses any queries regarding the gaps identified in the outcomes report. In response to requests for clarification from public sector bodies, additional software testing tools may be utilised as needed, such as the WebAim WAVE tool, WebAim Contrast Checker, and AChecker.

To track progress, the MCA reviews all assessed websites six months after the publication of the monitoring outcomes report, updating the accessibility score accordingly.

3.2.4 Follow up by the MCA on the In-Depth low performing websites

The MCA has also implemented a follow-up process for websites that perform very poorly and fail to improve their accessibility scores after the six-month rectification period. These are websites that are tested In-Depth and that score below 50%.

Initially, the MCA requests a meeting with the website owners to explore the root cause/s of the shortcomings. Subsequently, through a formal legal letter, these entities are required to provide the MCA with a clear and reasonable deadline for resolving the issues.

Failure to meet this deadline will result in the MCA taking appropriate regulatory measures in accordance with the Accessibility of the Websites and Mobile Applications of Public Sector Bodies Regulations (as per SL 418.03 of the Laws of Malta) (hereafter 'SL 418.03'). These measures may include publicising non-compliance, as per regulation 11 of SL 418.03, in a manner deemed appropriate by the MCA, and the imposition of administrative financial penalties.

3.2.5 Disproportionate Burden

So far, no public sector body has utilised the Disproportionate Burden Clause under Article 5 of the Directive. Nevertheless, the MCA has planned for this eventuality by leveraging the ToRB that is already established within the CRPD.

This mechanism enables the MCA to draw on the CRPD's expertise, ensuring a fair approach if a public sector body decides to use this clause.

The arrangement is also outlined in a Memorandum of Understanding (MoU) that the MCA has signed with the CRPD.

4. USE OF THE ENFORCEMENT PROCEDURE AND END-USER FEEDBACK

4.1 Feedback Mechanisms

The MCA makes use of the following feedback mechanisms to receive complaints related to public sector website and mobile application accessibility non- conformities.

4.1.1 Email and Telephone Complaints

The MCA accepts complaints through email and telephone channels.

a) Email Complaints – A dedicated shared mailbox was set up and used to receive email complaints related to website and mobile apps accessibility. This mailbox is monitored by the Authority's web accessibility team; and

b) Telephone Complaints – The MCA's web accessibility team accepts telephone complaints through the publicly available MCA telephone number.

Through the monitoring procedures, assessed public sector bodies are directed to include both the shared mailbox address and MCA telephone number in their accessibility statement as mechanisms to report any website accessibility non-conformities.

4.1.2 Public Sector Website Accessibility Complaint Form

To further streamline the end-user feedback process, the MCA developed an online complaint form. This form allows end users to inform the MCA about any public sector website or mobile application that does not comply with the accessibility standards mandated by the Directive.

The public sector website accessibility complaint form is made publicly available on the MCA website at MCA Accessibility Complaint Form.

As part of the monitoring procedures, the assessed public sector bodies are instructed to include a description of the feedback mechanism and a link to the public sector website accessibility complaint form in their accessibility statements, in accordance with the requirements of Article 7(1)(b) of the Directive.

The form submissions are monitored by the internal web accessibility team at the MCA.

4.1.3 Complaints received through other channels

I. Complaints received by the CRPD

Under the terms of a Memorandum of Understanding (MoU) established between the CRPD and the MCA, any complaints related to web accessibility received by the CRPD are promptly forwarded to the MCA. If the CRPD receives a complaint via telephone or email, it is directed to the MCA for further investigation.

4.2 Enforcement Procedure

The MCA addresses complaints received through the various channels by first informing the relevant public sector body of the website accessibility issue and recommending a rectification process. The public sector body is required to resolve the accessibility problem within a reasonable timeframe as established by the MCA. The timeline is established based on the severity and impact of the accessibility issue.

In the case of continued non-compliance, the MCA adopts the enforcement procedure as per the applicable national legislation as provided for in the 'Accessibility of the Websites and Mobile Applications of Public Sector Bodies Regulations' as per SL 418.03 of the Laws of Malta (hereafter 'SL418.03').

More specifically, reference is made to the following regulations as per SL 418.03 which detail the procedure followed:

*'**11.** (1) Subject to the provisions of regulation 9(6), where a public sector body does not comply with any of its obligations pursuant to these regulations, then the Authority may in the first instance publish the name of the public sector body and the decision of the Authority taken pursuant to regulation 9(5) in any such manner as it considers appropriate in the circumstances.*

(2) If notwithstanding the compliance measure taken by the Authority under sub-regulation (1), the public sector body still fails to comply with the decision of the Authority, then the Authority may, if such a decision has not been appealed by the public sector body, impose an administrative fine, not exceeding twenty thousand euro (€20,000):

Provided that before proceeding to impose any such fine the Authority shall write to the non-compliant public sector body warning it of the fine that may be imposed, the reasons there for, giving that public sector body a period of seven (7) days in which to make its written submissions. The Authority shall then proceed to decide whether to impose a fine and if it decides to impose a fine the amount thereof. In doing so the Authority shall state its reasons there for.

(3) For the purposes of these regulations the Authority may when undertaking a compliance measure which includes the publication of a decision, at its discretion publish only a summary consisting of the salient points of its decision such as it may consider appropriate in the circumstances.

***12.**(1) The public sector body concerned or the complainant as the case may be, may lodge an appeal before the Tribunal from a decision of the Authority issued pursuant to these regulations.*

(2) The effects of a decision by the Authority which is appealed from shall not, except where the Tribunal or the Court of Appeal, as the case may be, so orders, be suspended by virtue of the appeal:

Provided that any administrative fine imposed by the Authority shall not apply until the public sector body on whom the administrative fine is imposed has exhausted the right of appeal that it may exercise in accordance with these regulations, or if the public sector body to whom the decision is addressed has permitted the applicable time-limits to contest such a fine expire without availing itself of the said right of appeal.

13.*(1) Where the Authority exercises its powers pursuant to these regulations, the decision of the Authority shall forthwith be served on the public sector body to whom the decision is addressed and on the complainant, as the case may be, either by registered post to the official address of the public sector body and to the last known business or private address of the complainant, or by electronic means that provide a reliable record of when service took place.*

(2) In the case of service by electronic means, the decision shall be deemed to have been served upon the public sector body to whom the decision is addressed, and on the complainant as the case may be, when the Authority has received:

(a) an electronic receipt automatically generated by the e-mail server when the communication is read; or

(b) a written confirmation by return electronic mail from an employee of the public sector body to whom the decision is addressed, and from the complainant as the case may be.

(3) If service is not effected within a week of issuing the decision for any reason attributable to the public sector body to whom the decision is addressed, or to the complainant as the case may be, the Authority shall publish a notice in the Gazette and in one or more daily newspapers, stating that a decision has been taken in respect of the public sector body to whom the decision is addressed, or the complainant as the case may be, and inviting it or him to collect the decision from the Authority. In any such case, service shall be deemed to have been effected on the third day after the date of publication of the last notice.'

5. CONTENT RELATED TO ADDITIONAL MEASURES

5.1 Mechanisms for consulting with Web Accessibility stakeholders

5.1.1 Web Accessibility Focus Group

The MCA's main mechanism for consulting with web accessibility stakeholders revolves around the MCA's interaction with the Web Accessibility Focus Group. This Focus Group is managed by the CRPD and is governed by a Memorandum of Understanding (MoU) established in the course of the transposition of the Web Accessibility Directive into national law.

The MoU outlines the composition of the Focus Group, which includes representatives from various NGOs in the disability sector, such as the Office for Disability Issues (ODI), ADHD Support Malta, and the Deaf People Association, among others. The group is consulted on relevant issues related to web accessibility and provides feedback and insights on matters concerning persons with disabilities and the Web Accessibility Directive processes.

A representative from the Foundation for Information Technology Accessibility (FITA) is also part of the Web Accessibility Focus Group. FITA's expertise in digital accessibility has been invaluable to the MCA in implementing the Directive, leading to the establishment of an ongoing communication channel.

5.1.2 Public Awareness Initiatives

The Malta Communications Authority (MCA) utilises its social media pages and website to inform the public about any changes or developments in web accessibility for the public sector. Updates to the standards and processes adopted by the Authority as part of the Web Accessibility Directive are published through these channels. Additionally, any changes to procedures related to the implementation of the Directive, including monitoring, reporting, and enforcement, are also made public via these platforms.

To ensure consistency across different channels, the Authority publishes news items on the MCA website, which are then shared on the Authority's various social media pages. Other web accessibility stakeholders, such as the Commission for the Rights of Persons with Disability (CRPD) and the Foundation for Information Technology Accessibility (FITA), also share these news items to broaden the audience reach.

5.2 Training and Awareness Raising Activities

5.2.1 Training Activities

I. Tailor made course "Web Accessibility in the Private Sector" delivered to Government ICT Officials

The objective of this course was to provide a well-rounded view of the area of web accessibility, including concepts and practices that can be adopted in the various stages of an online service's lifecycle.

Following these sessions, participants should be able to (a) understand core concepts related to accessibility, universal design, and inclusive design, (b) understand how user agents and assistive technologies work, (c) understand the importance of semantic HTML in the context of web accessibility, (d) understand WCAG and EN principles, guidelines and success criteria, (e) understand WAI-ARIA and associated authoring practices, and (f) understand how to devise an accessibility testing strategy.

The course has been developed and delivered by Dr Chris Porter, a Senior Lecturer within the Faculty of ICT at the University of Malta. Dr Porter has a PhD in Computer Science from University College London (UCL). His research is primarily in the field of Human-Computer Interaction, focusing on web accessibility, assistive technologies, and software engineering. He also manages the Human-Computer Interaction Lab within the Faculty of ICT.

These training sessions were jointly organised by the Malta Communications Authority, the eSkills Malta Foundation and the Faculty of Information and Communication Technology at the University of Malta.

Certificates of participation, along with a resource document and a feedback form, were sent to all attendees. The first run of the course in 2023 was highly successful, with the Malta Communications Authority (MCA) receiving very positive feedback.

Plans are underway to repeat the course in 2024, with minor improvements, including the introduction of a more hands-on component within the sessions.

The agenda for the 2023 sessions can be viewed here.

Additionally, the MCA raised awareness on WAD matters by sharing social media posts featuring pictures from these sessions.

5.2.2 Awareness Raising Activities

The MCA organises several awareness raising activities in parallel with its monitoring and enforcement procedures. These awareness raising activities are primarily targeted at the general public to provide information related to the Web Accessibility Directive's implementation and Digital Accessibility in general.

I. Accessibility Social Media Public Relations Campaign

The MCA regularly implements PR campaigns to efficiently reach the general public and raise awareness. Facebook and LinkedIn are typically the primary social media platforms utilised for these initiatives.

A key campaign during this reporting period focused on providing practical tips for enhancing website accessibility for various disabilities.

To effectively communicate the content of each post, a series of infographics was commissioned to accompany the posts. The following are examples of the information and corresponding infographics presented:-

POST 01

Web Accessibility is not only for people with disabilities but for all of us who are thankful that there are no barriers in using our abilities. – REMBERTO ESPOSA JR

Web Accessibility by design grants equal access for all users and ensures that the web can be navigated, understood, and accessed by people with a diverse range of visual, auditory, cognitive, and physical abilities.

POST 02

TIPS FOR MAKING WEBSITES MORE ACCESSIBLE FOR THE VISUALLY IMPAIRED

Visual impairments span a range of issues and disabilities, including colour blindness, low vision, and blindness. Make your website more accessible to the visually impaired by following these simple web design tips -

- Provide sufficient contrast using colours and textures
- Allow manual font size adjustment
- Grant keyboard accessibility
- Provide alt text or descriptions for images and non-text content
- Use explicit and descriptive labels for links and buttons

POST 03

TIPS FOR MAKING WEBSITES MORE ACCESSIBLE FOR THE HEARING IMPAIRED

According to the World Health Organization, right now, over 5% of the world's population (around 466 million people) has a disabling hearing loss.

Make sure to provide multiple contact options on your website and not just a phone number, as deaf people cannot hear well on the phone. Offer other means of contact and communication like email, skype, live web chat, or online forms. Some other tips could include:-

- Provide text transcripts and captions whenever sounds are present
- Consider Sign language interpretation especially when transmitting live content

POST 04

TIPS FOR MAKING WEBSITES MORE ACCESSIBLE FOR THE PHYSICAL AND MOTOR IMPAIRED

Some of the most common assistive technologies used by people with a motor or physical impairment include; alternative keyboard (for example, with larger space between keys), head wand (for typing with head movements), trackball mouse, mouth stick, speech recognition software and eye-tracking technologies. When designing a website, ensure that it is accessible to these technologies.

Some other tips:

- All functions need to be accessible and easy to use via keyboard
- Forms need to have error identification/focus
- Include appropriate labels for controls
- The TAB order must be logically displayed

POST 05

TIPS FOR MAKING WEBSITES MORE ACCESSIBLE FOR THE COGNITIVE IMPAIRED

Cognitive impairment refers to a broad range of disabilities, from people with intellectual disabilities, to age-related issues with thinking processes and memory. The range includes people with mental illnesses, such as depression and schizophrenia and also people with learning disabilities, such as dyslexia and attention deficit hyperactivity disorder (ADHD).

Consider these features to make your website more accessible!

- Minimise distractions, reduce unnecessary content, clutter or adverts
- Use plain and simple language
- Divide processes into logical, essential steps with progress indicators;
- Make website authentication as easy as possible without compromising security;
- Make forms easy to complete, with clear error messages and simple error recovery.

POST 06

FEEDBACK

We need your feedback!

At the MCA we have been conducting Web Accessibility tests on Public Sector Websites for the past 3 years.

Give us your feedback and let us know if you ever had problems accessing public sector websites by completing this form. Or drop us a line on web.accessibility@mca.org.mt

II. Accessibility Conferences and Seminars

"Digital technology for Independent Living" – Seminar – October 2022

Organised by the Commission for the Rights of Persons with Disability (CRPD), the Malta Communications Authority (MCA), and Tech.mt, the seminar entitled "Digital Technology for Independent Living" convened stakeholders from the disability and technology sectors to foster dialogue between them.

This seminar was part of a national initiative aimed at promoting independent living within the community and reducing the institutionalisation of persons with disabilities, in alignment with CRPD's strategy, the national disability strategy, and the United Nations Convention for the Rights of Persons with Disabilities, which has been recently incorporated into Maltese legislation.

During the seminar, various stakeholders highlighted the challenges faced by both sectors, emphasising that if the needs of all users, including persons with disabilities, are not considered from the outset by technology creators, there is a risk of excluding some users.

“Digital Assistive Technology: The Current Situation & Way Forward” - ACTU Conference – November 2023

The Access to Communication and Technology Unit (ACTU) within Aġenzija Sapport organised an international online conference to discuss the current situation of digital assistive technology.

Various local, as well as international experts, addressed the importance of Digital Assistive Technology for persons with disability, explaining what is currently being done locally in this field. Particular emphasis was made on education, employment and ICT accessibility. The conference also discussed the main international developments in Digital Assistive Technology.

The MCA was part of a panel discussion on the various initiatives that are currently being rolled out to enhance accessibility. This participation provided an opportunity for the MCA to give an overview of the work being carried out on the implementation of the WAD. Furthermore, it was a good opportunity to showcase the various awareness and educational initiatives related to web accessibility that the MCA regularly designs and implements. The panel was moderated by Dr Alistair De Gaetano from the Directorate for Disability Issues, and included representatives from; FITA, UOM, CRPD and Agenzija Sapport.

WADEX meeting in Brussels – November 2023

Representatives from the MCA also attended the WADEX In person meeting held in Brussels in November 2023.

The meeting was highly informative, featuring an array of workshops and discussions with colleagues from fellow member states, which facilitated extensive knowledge sharing. A variety of topics were addressed, including:

- Monitoring and testing;
- Reporting and progress;
- Tools, expertise and skills;
- Enforcement, accessibility statements, feedback mechanism

This engagement not only enhanced mutual understanding but also fostered collaborative efforts among member states.

“The Digital Juncture” - Malta Communications Authority’s Conference – November 2022

The MCA conference entitled “The Digital Juncture” gathered a number of stakeholders to discuss the fast-changing developments in technology. The conference focused on addressing the essential considerations that the Malta Communications Authority (MCA), as a digital communications regulator, along with its network of collaborators, must take into account to maintain a current legal and regulatory framework that fosters an effective, consumer- and business-friendly digital economy.

Conference Agenda Item - MyHealth Fireside Chat as a best practice example of Web Accessibility

Amongst other items, the conference included a “Fireside Chat” with the owners of the MyHealth Portal as an example of best practice in Web Accessibility.

The interactive digital portal MyHealth, allows Maltese citizens, and their doctors, to view their medical records. By logging in with the ID number and e-ID password, Maltese citizens may view medical records such as Case Summaries, upcoming Hospital Appointments, Laboratory Results, Medical Images, Medical Imaging Reports, Vaccination Records, Electrocardiograms and the Personal Health Journal.

During this reporting period, the MyHealth portal was included in the In-Depth WAD sample, and significant efforts were made to enhance its accessibility. The Malta Communications Authority (MCA) chose to acknowledge and highlight these efforts through a brief interview at the conference "The Digital Juncture."

Highlights of the conference can be seen here:- https://www.youtube.com/watch?v=NqINc7zNykw