



# Kent Pension Fund Accessibility Audit Report

## Revision History

Version	Date	Authors	Comment
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## Introduction

Digital Inclusion is a fundamental component of Kent County Council. KCC aims to ensure that the digital services via the web are available for all customers and are fully accessible to the meet diverse needs of citizens in Kent. The programme aims to support KCC's staff and customers with digital skills and to provide the necessary channels to connect to The Authority's services.

KCC has committed to following the Government Digital Service's 'Standard' as the baseline roadmap, with the three core Digital Inclusion principles of 'Connectivity', 'Digital Skills' & 'Accessibility' placed at the heart of the programme.

In order to satisfy the 'Accessibility' element of the Digital Inclusion principles, an accessibility audit of the **Kent Pension Fund** system has been carried out.

## What is 'Accessibility'?

A variety of impairments affect the user's ability to perceive, understand or physically manipulate things. They can occur for many different reasons, including medical conditions, injury, the environment, or age.

For example, customers may have difficulty:

- Perceiving visual things if they are blind or partially sighted
- Perceiving sounds if they are deaf or hard of hearing or if they are working in a noisy environment
- Understanding things if they have a learning impairment
- Manipulating things if they have a physical disability, an injury or as a consequence of age.

The goal of Accessibility is to ensure that application software/hardware/systems are available to and usable by the widest possible audience. This requires that wherever practical, users can perceive and understand what is on the screen and operate the controls.

## Accessibility Compliance

KCC is committed to complying with the following standards with regards to Digital Accessibility:

- [Equality Act 2010](#)
- [Public Sector Bodies \(Websites and Mobile Applications\) Accessibility Regulations 2018](#)
- [Web Content Accessibility Guidelines \(WCAG 2.1\)](#)
- [ISO/IEC 13066-1: 2011 Information Technology – Interoperability with assistive technology](#)
- [EN 301 549](#)

Accessibility non-compliance is monitored by Government Digital Service (GDS). GDS may audit any KCC web-based system without notice and pass the results back to the named contact on the website's accessibility statement. If an audit is received from GDS, the System Owner must:

- Pass all information to the Digital Accessibility Team, who will respond on behalf of KCC
- Work with the Digital Accessibility Team and suppliers to fix all identified issues by the specified date.

The Digital Accessibility Team will collate evidence for GDS and the Equality and Human Rights Commission which will require input from the service. Any remaining issues on or after the deadline could result in legal action against KCC under the Equality Act (2010) as well as significant reputational damage.

## Accessibility Evaluation Standards

The Audit uses Web Content Accessibility Guidelines (WCAG 2.1) Accessibility Checklist as its basis, with the [WebAIM WCAG 2.1 checklist](#) as the key interpreter. WCAG 2.1 AA is the accessibility standard set by the Government Digital Service under the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018 and as an organisation KCC is required to comply with this standard for all its digital systems.

Within the evaluation each point of WCAG is awarded a 'Pass', 'Partially Met', 'Not Met' or N/A result. To be compliant against the regulations, a system must:

- Have received all Pass marks applicable to their platform and content (no Partial or Not Met results)
- Have received all Pass marks associated with the mobile design checklist.
- Published an accessibility statement in line with KCC's template ([available on KNet](#)).

This audit will also seek to determine the severity of a system's accessibility issues and a risk rating will be determined based on a multiplication of the system's likelihood of challenge that results in damage to The Authority, and the severity of accessibility issues found in this audit.

	1	2	3	4	5
<b>Challenge</b>	Very Unlikely	Unlikely	Possible	Likely	Very Likely
<b>Severity of Issues</b>	Accessibility statement & few minor/cosmetic issues present	Accessibility statement & numerous minor/cosmetic issues present	<p>Accessibility statement &amp; significant issues present</p> <p>No accessibility statement &amp; numerous minor/cosmetic issues present</p> <p>Use of an <a href="#">accessibility overlay</a> is present</p>	<p>No accessibility statement &amp; significant issues present</p> <p>Use of an <a href="#">accessibility overlay</a> is present</p>	<p>No accessibility statement &amp; issues that exclude user groups present</p> <p>Use of an <a href="#">accessibility overlay</a> is present</p>

## Web Content Accessibility Guidelines (WCAG 2.1)

Web Content Accessibility Guidelines (WCAG) are developed through the W3C process in cooperation with individuals and organisations from around the world and aim to provide a single shared standard for web accessibility.

WCAG 2.1 is divided into three conformance levels (A, AA, AAA) with the success criteria based on the impact they have on design or visual presentation of the pages. For the purposes of this audit only the first two levels (A & AA) will be utilised.

The WCAG Levels can be interpreted as follows:

- Level A** - Success criteria are those which will have a high impact on a broad array of user populations. In other words, they (usually) do not focus on one type of disability alone. They will also have the lowest impact on the presentation logic and business logic of the site.
- Level AA** - Success criteria will also have a high impact for users. Sometimes only specific user populations will be impacted, but the impact is important. Adherence to these success criteria may impose changes to a system's presentation logic or business logic.

## Audit Scope

The Accessibility Audit described in this document represents a view of the target system at the time of audit. A representative selection of user journeys are assessed, this sample based on recommendations within [Government Digital Services guidance for performing an accessibility check](#). Issues found within this audit could be present in other areas of the system that were not included within scope.

The following pages were tested against WCAG 2.1:

Page	URL
Home Page	<a href="https://www.kentpensionfund.co.uk/">https://www.kentpensionfund.co.uk/</a>
Local Government Page	<a href="https://www.kentpensionfund.co.uk/local-government">https://www.kentpensionfund.co.uk/local-government</a>
Police Officers Page	<a href="https://www.kentpensionfund.co.uk/police-officers">https://www.kentpensionfund.co.uk/police-officers</a>
About Us Page	<a href="https://www.kentpensionfund.co.uk/local-government/about-us">https://www.kentpensionfund.co.uk/local-government/about-us</a>
Administration of the Fun Page	<a href="https://www.kentpensionfund.co.uk/local-government/about-us/administration-of-the-fund">https://www.kentpensionfund.co.uk/local-government/about-us/administration-of-the-fund</a>
Contact us Page	<a href="https://www.kentpensionfund.co.uk/local-government/about-us/contact-us">https://www.kentpensionfund.co.uk/local-government/about-us/contact-us</a>
Pensioner member contact us Page	<a href="https://www.kentpensionfund.co.uk/local-government/pensioner-member-receiving-a-pension/contact-us">https://www.kentpensionfund.co.uk/local-government/pensioner-member-receiving-a-pension/contact-us</a>

## Detailed Results

The results of the audit ordered by WCAG points with information on the specific failures and explanations of remedial action required are detailed in the following table. For greater technical detail results of the audit please see the associated audit fault log for this system.

For information on each WCAG criterion's requirements and recommendations, please see the [WebAIM WCAG 2.1 checklist](#).

WCAG No.	Level	Guideline	Status	Evaluation	Remedial Action
1.1.1	A	<a href="#">Non-text Content</a> <i>Provide text alternatives for non-text content</i>	Pass	There is alt text associated with all elements that require it.	
1.2.1	A	<a href="#">Audio-only and Video-only (Pre-recorded)</a> <i>Provide an alternative to video-only and audio-only content</i>	N/A	Content not available.	
1.2.2	A	<a href="#">Captions (Pre-recorded)</a> <i>Provide captions for videos with audio</i>	N/A	Content not available.	
1.2.3	A	<a href="#">Audio Description or Media Alternative (Pre-recorded)</a> <i>Video with audio has a second alternative</i>	N/A	Content not available.	
1.2.4	AA	<a href="#">Captions (Live)</a> <i>Live videos have captions</i>	N/A	Content not available.	
1.2.5	AA	<a href="#">Audio Description (Pre-recorded)</a> <i>Users have access to audio description for video content</i>	N/A	Content not available.	
1.3.1	A	<a href="#">Info and Relationships</a> <i>Logical structure</i>	Pass	There is a logical structure to how content has been ordered.	
1.3.2	A	<a href="#">Meaningful Sequence</a> <i>Present content in a meaningful order</i>	Pass	There is a meaningful sequence to all content on the website.	



1.3.3	A	<a href="#">Sensory Characteristics</a> <i>Use more than one sense for instructions</i>	Pass	There is more than one sense is used for instructions.	
1.3.4	AA	<a href="#">Orientation</a> <i>Content is not restricted to only one orientation</i>	Pass	Content is not restricted to only one orientation.	
1.3.5	AA	<a href="#">Identify Input Purpose</a> <i>Input fields have appropriate autocomplete attributes defined</i>	Pass	All input fields have appropriate autocomplete attributes.	
1.4.1	A	<a href="#">Use of Colour</a> <i>Don't use presentation that relies solely on colour</i>	Pass	Presentation does not solely rely on colour.	
1.4.2	A	<a href="#">Audio Control</a> <i>Don't play audio automatically</i>	Pass	Audio does not play automatically when loading up the web page.	
1.4.3	AA	<a href="#">Contrast (Minimum)</a> <i>Contrast ratio between text and background is at least 4.5:1</i>	Pass	Contrast ratio between text and background is at least 4.5:1 or higher.	
1.4.4	AA	<a href="#">Resize Text</a> <i>Text can be resized to 200% without loss of content or function</i>	Pass	Text can be resized to 200% without loss of content or function.	
1.4.5	AA	<a href="#">Images of Text</a> <i>Don't use images of text</i>	Pass	There are no images of text used on the website.	
1.4.10	AA	<a href="#">Reflow</a> <i>No loss of content or functionality occurs, and horizontal</i>	Pass	There is no loss of content or functionality occurs, and horizontal	

		<i>scrolling is avoided when content is presented at a width of 320 pixels.</i>		scrolling is avoided when content is presented at a width of 320 pixels.	
1.4.11	AA	<u>Non-text Contrast</u> <i>Contrast ratio of hover and graphical components and background is at least 3:1</i>	Pass	Contrast ratio of hover and graphical components and background is at least 3:1 or higher.	
1.4.12	AA	<u>Text Spacing</u> <i>No loss of content/functionality when text spacing/line height is 1.5x font size, paragraph spacing is 2x font size, word spacing is .16x font size and letter spacing is .12x font size</i>	Pass	There is no loss of content or functionality when applying text spacing.	
1.4.13	AA	<u>Content on Hover or Focus</u> <i>Content on hover or focus can be dismissed, focused on and remains visible until focus is taken away from the content</i>	Pass	Content on hover or focus can be dismissed, focused on and remains visible until focus is taken away from the content.	
2.1.1	A	<u>Keyboard</u> <i>Accessible by keyboard only</i>	Pass	All elements are accessible when only using the keyboard.	
2.1.2	A	<u>No Keyboard Trap</u> <i>Don't trap keyboard users</i>	Pass	There are no keyboard traps on any of the pages.	
2.1.4	A	<u>Character Key Shortcuts</u> <i>Ability to disable custom key shortcuts is provided</i>	Pass	There is the ability to disable custom key shortcuts on the Kent Pension Fund site.	

2.2.1	A	<a href="#">Time Adjustable Pass</a> <i>Time limits have user controls</i>	N/A	Content not available.	
2.2.2	A	<a href="#">Pause, Stop, Hide</a> <i>Provide user controls for moving content</i>	Pass	There are user controls for moving content that the user has full control over.	
2.3.1	A	<a href="#">Three Flashes or Below</a> <i>No content flashes more than three times per second</i>	Pass	No content flashes more than three times per second.	
2.4.1	A	<a href="#">Bypass Blocks</a> <i>Provide a 'Skip to Content' link</i>	Pass	There is a "Skip to main content" link at the top of every page that receives keyboard focus.	
2.4.2	A	<a href="#">Page Titled</a> <i>Helpful and clear page title</i>	Pass	Helpful and clear page title is provided.	
2.4.3	A	<a href="#">Focus Order</a> <i>Logical order</i>	Pass	There is a logical order to content on the website.	
2.4.4	A	<a href="#">Link Purpose (In Context)</a> <i>Every link's purpose is clear from its context</i>	Pass	Every link has accessible text associated with it, clearly explaining its purpose and destination.	
2.4.5	AA	<a href="#">Multiple Ways</a> <i>Offer several ways to find pages</i>	Pass	There are multiple ways of navigating the website.	
2.4.6	AA	<a href="#">Heading and Labels</a> <i>Use clear headings and labels</i>	Pass	Clear headings and labels are used.	
2.4.7	AA	<a href="#">Focus Visible</a> <i>It is clear which element has current keyboard focus</i>	Pass	There is a visible focus indicator on all sections of the website.	

2.5.1	A	<a href="#">Pointer Gestures</a> <i>All non-essential multipoint gestures can be performed with a single point</i>	Pass	All non-essential multipoint gestures can be performed with a single point.	
2.5.2	A	<a href="#">Pointer Cancellation</a> <i>Avoid non-essential down-events</i>	Pass	Non-essential down-events have been avoided.	
2.5.3	A	<a href="#">Label in Name</a> <i>If components present text, their accessible tags include the same text</i>	Pass	Text and labels have the same accessible text as one another.	
2.5.4	A	<a href="#">Motion Actuation</a> <i>Functionality triggered by motion can be disabled and an alternative provided</i>	N/A	Content not available.	
3.1.1	A	<a href="#">Language of Page</a> <i>Page has a language assigned</i>	Pass	The language of the page has been defined.	
3.1.2	AA	<a href="#">Language of Parts</a> <i>Tell users when the language on a page changes</i>	Pass	There is an ability to change languages on the page.	
3.2.1	A	<a href="#">On Focus</a> <i>Elements do not change when they receive focus</i>	Pass	All elements that receive focus do not change when they do and do not change any other elements on the page.	
3.2.2	A	<a href="#">On Input</a> <i>Elements do not change when they receive input</i>	Pass	Elements do not change when they receive input.	
3.2.3	AA	<a href="#">Consistent Navigation</a> <i>Use menus</i>	Pass	Menus are used consistently.	

		<i>consistently</i>			
3.2.4	AA	<u>Consistent Identification</u> <i>Components that have the same functionality within a set of web pages are identified consistently.</i>	Pass	Components that have the same functionality within a set of web pages are identified consistently.	
3.3.1	A	<u>Error Identification</u> <i>Clearly identify input errors</i>	Pass	Errors are clearly shown to the user.	
3.3.2	A	<u>Labels or Instructions</u> <i>Labels or instructions are provided when content requires user input.</i>	Pass	There are labels and instructions provided when it is needed.	
3.3.3	AA	<u>Error Suggestion</u> <i>Suggest fixes when users make errors</i>	Pass	All errors are described in good and thorough detail.	
3.3.4	AA	<u>Error Prevention (Legal, Financial, Data)</u> <i>Reduce the risk of input errors for sensitive data</i>	N/A	Content not available.	
4.1.1	A	<u>Parsing</u> <i>Significant HTML/XHTML validation/parsing errors are avoided</i>	Pass	Significant HTML/XHTML validation/parsing errors are avoided.	
4.1.2	A	<u>Name, Role, Value</u> <i>Build all elements for accessibility</i>	Pass	All elements have been built for accessibility.	
4.1.3	AA	<u>Status Messages</u> <i>Status messages announced by the screen reader if not focused on</i>	Pass	All status messages are announced to the user when they occur when using text and screen readers.	

## Mobile Testing

Checkpoint	Guideline	Status	Evaluation
MB1	Limit scrolling to one direction	Pass	Scrolling limited to one direction
MB2	All-important content reachable in sequence	Pass	Logical sequence
MB3	Website delivers a mobile dedicated design	Pass	Website does deliver a mobile dedicated design

## Accessibility Audit Result Overview

### WCAG Audit

Pass, Partially Met, Not Met	No.
Pass	44
Partially Met	0
Not Met	0

### Mobile Testing

Pass, Partially Met, Not Met	No.
Pass	3
Partially Met	0
Not Met	0

### Accessibility Statement

The Kent Pension Fund system does have a published Accessibility Statement in line with the [KCC Template](#).

### Final Result

The Kent Pension Fund system has been given a risk rating of **LOW**

- Compliant accessibility statement in place
- **Low risk** – Minor/cosmetic issues – something is wrong, but it won't affect users significantly.

Likelihood of challenge	4
Severity of accessibility issues	1
<b>Risk Rating</b>	<b>4 (Low)</b>

### Remedial Action

It is the system owner's responsibility to ensure that the system complies with WCAG 2.1 AA and active steps are taken towards resolving issues identified in this audit. This should be done in the following order:

1. Discuss the audit results with the Digital Accessibility Team and provide timescales for remedial actions
2. Ensure that the system has a published Accessibility Statement and that the known issues have been populated with the results of this audit
3. Contact your suppliers to make the necessary changes to Kent Pension Fund system for WCAG 2.1 compliance
4. Ensure that all relevant content created by your staff has been made accessible per the WCAG 2.1 requirements
5. Ensure that accessibility requirements are built into future contracts.

For greater technical detail results of the audit please see associated Audit Fault Log.

As a **low** risk site, Kent Pension Fund will not be re-audited in the next 12 months unless you inform us of a major change. The KCC Digital Accessibility team will contact you in 12 months to confirm that the issues are being worked on and that the risk to KCC is still low. Please keep your Directorate Accessibility Champion informed of progress remediating any issues identified.

You can find further advice and guidance about digital accessibility on the [Digital Accessibility KNet Page](#).

## Disclaimer

The Accessibility Audit described in this document represents a view of the target system at the time of audit.

Any content or structural changes made to the system after this point have the potential to impact on the level of compliance, and accessibility impact should be assessed before any changes are carried out.

At a later date if you are requested to provide evidence of progress on remedial action by the Digital Accessibility Compliance team, please ensure that you have this evidence available as this may be required for GDS monitoring purposes.

Whilst every effort has been made to ensure the accuracy of this audit and the recommendations within, this report is for general information only and is not legal advice or a guarantee of legal compliance. If you require legal advice on how this impacts your service or KCC overall, please consult with your appropriate legal advisor.