

NHS South East London CCG

Accessibility Assessment Report

27th May 2022

Accessibility
Services

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Introduction

Shaw Trust Accessibility Services conducted an accessibility audit on the NHS South East London CCG website. This report documents the outcomes of the accessibility audit, identifying accessibility issues and describing their impact on users. In addition, to help solve each accessibility issue, practical solutions and best practices are provided.

The aims of this report are to firstly, identify accessibility barriers, and secondly, provide guidance on how to remove barriers to prevent older people and people with disabilities from being excluded.

Executive Summary

This report documents the outcomes of the accessibility audit on the NHS South East London CCG website carried out by Shaw Trust Accessibility Services, 12 April 2022. The website was evaluated against the W3C Web Content Accessibility Guidelines (WCAG) 2.1 up to conformance level AA (see [Web Content Accessibility Guidelines](#) for details). Automated evaluation tools and manual testing by an experienced in-house pan-disabled testing team were utilised to complete a comprehensive accessibility audit (see [Methodology](#) for details).

The NHS South East London CCG website met 6 of the 19 (32%) applicable success criteria required for level A conformance and 5 of the 14 (36%) applicable success criteria required for level AA conformance.

Based on these results, Shaw Trust Accessibility Services is unable to award the NHS South East London CCG website an accessibility accreditation at this time. In order to be awarded a Shaw Trust Level AA accreditation, 100% conformance with level A success criteria and level AA must be achieved. In order to be awarded a Shaw Trust AAA accreditation, 100% conformance with level A, level AA and level AAA must be achieved.

At present, the NHS South East London CCG website does not conform to the minimum level of accessibility (level A). Non-conformance to the minimum level of accessibility will result in a wide range of users from being excluded from being able to access the website. However, this report also provides guidance to help achieve accessibility conformance and accreditation in the future.

Web Content Accessibility Guidelines

The World Wide Web Consortium (W3C) is the leading standards organisation for the World Wide Web who provides guidelines and specifications for many web technologies. The Web Accessibility Initiative (WAI), a branch of the W3C, is responsible for developing the Web Content Accessibility Guidelines (WCAG). The WCAG documents explain how to make Web content more accessible to people with disabilities including people with visual, hearing, cognitive and physical conditions. WCAG is recognised as the international standard for building accessible websites and measuring web accessibility.

Web Content Accessibility Guidelines 2.1

WCAG 2.1 was formally published on 5th June 2018, bringing web accessibility guidance up to date with modern web technologies and development techniques. As a result, the W3C WAI recommends using WCAG 2.1, instead of WCAG 1.0 or WCAG 2.0.

WCAG 2.0 is still a valid and very useful standard. WCAG 2.1 works in concert with WCAG 2.0 and is comprised of four principles: perceivable, operable, understandable, and robust. The principles are broken down into 13 guidelines consisting of success criteria. WCAG 2.0 defines three levels of success criteria:

Level A – Lowest success criteria

Level AA – Intermediate success criteria

Level AAA – Highest success criteria

Conformance to WCAG 2.1 is measured using the same three levels that define the success criteria:

Level A – Achieved when all applicable Level A success criteria are satisfied. This is considered to be the absolute minimum level of compliance.

Level AA – Achieved when all applicable Level A and Level AA success criteria are satisfied. This is considered to be the preferred level of compliance.

Level AAA – Achieved when all applicable Level A, Level AA and Level AAA success criteria are satisfied. This is considered to be the optimum level of compliance.

Learn more about the WCAG 2.1: <http://www.w3.org/TR/WCAG>

Methodology

To conduct a thorough accessibility audit, the use of both automated evaluation tools and manual user testing with assistive technologies is essential.

Although automated tools are able to assess individual pages or entire websites much more quickly than a human counterpart, they can only test against a limited section of WCAG and are unable to analyse semantics where human judgement via user testing is imperative.

It is also crucial that users who have a disability carry out manual testing. This is because firstly, it is almost impossible to replicate conditions of disabled users and their use of assistive technologies to a realistic degree of accuracy, and secondly, because testing with disabled users provide a more accurate measurement of accessibility.

Shaw Trust Accessibility Services use a combination of automated evaluation tools and in-house pan-disability user testing with assistive technologies to conduct a comprehensive accessibility audit. Accessibility audits are conducted against WCAG 2.1 Success Criterion. Testing is performed to level AA conformance unless a different level of conformance is requested.

Scope

In order to perform a comprehensive accessibility audit, the entire website must be tested. Although this can be achieved using automated evaluation tools, in many cases it is unfeasible to test an entire website manually. In this situation, the scope of manual testing is specified at the start of the audit.

The scope of manual testing involves establishing a representative sample of pages by employing various methods including using a list of pages common to many websites, inspecting the site for variations in layout and functionality and selecting pages at random. The sample may also include pages requested by the client.

In addition, the scope of manual testing may also include user journeys for sites that involve complex or multi-stage tasks, such as finding specific information, buying a product or completing a registration form. User journeys may be added to the scope of testing if deemed appropriate or at the request of the client.

Technical Testing

Technical testing involves testing the entire website for underlying technical errors or issues that could cause accessibility barriers. A Technical Consultant who possesses knowledge and experience of accessibility and web technologies conducts technical testing using one or more automated tools. These tools are used to scan pages for technical accessibility issues such as HTML/CSS parsing errors. The Technical Consultant then analyses and interprets the results.

Manual User Testing

The website is manually tested by an in-house team of experienced pan-disabled testers, many of which use assistive technologies. The team is made up of individuals with different disabilities to cover the widest range of accessibility barriers as possible. Each testing team consists of the following:

- **Keyboard Only User**

The user has a motor impairment that limits he or she to using only a keyboard to operate a computer or device. To make operation easier, the user may utilise an adaptive keyboard.

- **Voice Activation User**

The user has a motor impairment that limits him or her to using only voice commands to operate a computer or device via assistive technology such as microphone and dictation software.

- **Screen Reader User**

The user has a visual impairment that limits him or her to using assistive technology such as a screen reader to operate a computer or device via keyboard control and feedback via synthesised audible descriptions of visual elements.

- **Low Vision User**

The user has a visual impairment that limits his or her access to content presented at 100% magnification. The user utilises system/browser controls or assistive technology to increase screen magnification.

- **Colour Blind User**

The user has a visual impairment that limits his or her access to content within a certain colour spectrum. The user utilises system/browser controls or assistive technology to change the content's colour spectrum.

- **Deaf or Hard of Hearing User**

The user has a hearing impairment that limits his or her access to audio content.

- **Learning Difficulties User**

The user has a learning disability that limits his or her access to content that is presented in a way that requires a high level of literacy.

Note: Testers may have a combination of disabilities.

Manual auditing consists of each member of the team performing tests and/or completing user journeys based on criteria relevant to their individual disability and accessibility guidelines. The testers use multiple browsers, browser tools and assistive technologies in an aim to locate issues. They then report their findings and provide constructive feedback to help pinpoint and provide solutions to accessibility barriers.

Audit Details

Client Details

Organisation	NHS South East London CCG	
Primary Contact	Name	Daniel Torrance-Cameron
	Position	Digital Communications Officer
	Email	daniel.torrancecameron@nhs.net

Provider Details

Organisation	Shaw Trust Accessibility Services	
Primary Contact	Name	Graham Rees-Evans
	Position	Technical Account Manager
	Email	graham.rees-evans@shaw-trust.org.uk
	Phone	0203 215 2745

Testing Details

Type	Website	
URL	https://selondonics.wpengine.com	
Name	NHS South East London CCG Website	
Description	Partnership that brings together the organisations responsible for publicly funded health and care services in South East London	
Primary Language	English	
Testing Type	Assessment	
Testing Environment	Windows 10 Google Chrome / Microsoft Edge JAWS 2020 / NVDA 2019 / ZoomText 2019 / Dragon Professional 15	
Testing Team	Alan Sleat Kevin James	Screen Reader Keyboard Only

	Darren Hardman Sam Hopkins Adam Armstrong Lee Ellery William Treharne Steve Evans	Deaf Low Vision & Colour Learning Difficulties Voice Activation Hard of Hearing Low Vision & Colour
Technical Account Officer	Lianne Richards	
Technical Consultant	Graham Rees-Evans	
Quality Assurance	Graham Rees-Evans	
Date Tested	12/04/2022	
Date Report Issued	27/05/2022	

Audit Results

Results Summary

Priority A Results

Issue(s) Ref	Success Criterion	Current Results
STAS-F04/F05/F06/ F07/F11/F13/F14/ F18	1.1.1 Non-text Content	FAIL
STAS-F11	1.2.1 Prerecorded Audio-only and Video-only	FAIL
STAS-F11	1.2.2 Captions (Prerecorded)	FAIL
STAS-F11/F12	1.2.3 Audio Description or Media Alternative (Prerecorded)	FAIL
STAS-F02/F03/F04/ F05/F06/F07/F08/ F14/F18	1.3.1 Info and Relationships	FAIL
	1.3.2 Meaningful Sequence	PASS
	1.3.3 Sensory Characteristics	N/A
	1.4.1 Use of Colour	N/A
	1.4.2 Audio Control	N/A
STAS-F10	2.1.1 Keyboard	FAIL
	2.1.2 No Keyboard Trap	PASS
	2.1.4 Character Key Shortcuts	N/A
	2.2.1 Timing Adjustable	N/A
	2.2.2 Pause, Stop, Hide	N/A
	2.3.1 Three Flashes or Below Threshold	N/A
STAS-F01	2.4.1 Bypass Blocks	FAIL
STAS-F15/F18	2.4.2 Page Titled	FAIL
	2.4.3 Focus Order	PASS
STAS-F08/F09	2.4.4 Link Purpose (In Context)	FAIL
	2.5.1 Pointer Gestures	N/A
	2.5.2 Pointer Cancellation	N/A
STAS-F04/F14	2.5.3 Label in Name	FAIL
	2.5.4 Motion Actuation	N/A
	3.1.1 Language of Page	PASS
	3.2.1 On Focus	PASS
	3.2.2 On Input	PASS
	3.3.1 Error Identification	N/A
STAS-F04/F05/F06/ F07/F14	3.3.2 Labels or Instructions	FAIL
STAS-F16/F17	4.1.1 Parsing	FAIL
STAS-F04/F05/F06/ F07/F14/F17	4.1.2 Name, Role, Value	FAIL
Total		30
Non-Applicable		11
Compliant (Pass)		06
Non-Compliant (Fail)		13

Priority AA Results

Issue(s) Ref	Success Criterion	Current Results
	1.2.4 Captions (Live)	N/A
STAS-F12	1.2.5 Audio Description (Prerecorded)	FAIL
	1.3.4 Orientation	N/A
STAS-F04/F05/F06/ F07/F14	1.3.5 Identify Input Purpose	FAIL
STAS-F19	1.4.3 Contrast (Minimum)	FAIL
STAS-F21	1.4.4 Resize Text	FAIL
STAS-F13	1.4.5 Images of Text	FAIL
	1.4.10 Reflow	PASS
STAS-F19	1.4.11 Non-text Contrast	FAIL
	1.4.12 Text Spacing	PASS
STAS-F10	1.4.13 Content on Hover or Focus	FAIL
	2.4.5 Multiple Ways	PASS
STAS-F02/F03	2.4.6 Headings and Labels	FAIL
STAS-F20	2.4.7 Focus Visible	FAIL
	3.1.2 Language of Parts	N/A
	3.2.3 Consistent Navigation	PASS
	3.2.4 Consistent Identification	PASS
	3.3.3 Error Suggestion	N/A
	3.3.4 Error Prevention (Legal, Financial, Data)	N/A
	4.1.3 Status Messages	N/A
Total		20
Non-Applicable		06
Compliant (Pass)		05
Non-Compliant (Fail)		09

Issues

#	Ref	Issue	Level	WCAG References
1	STAS-F01	Non-Functioning 'Skip' Navigation	A	2.4.1
2	STAS-F02	Incorrect Heading Structure	A/AA	1.3.1, 2.4.6
3	STAS-F03	Empty Headings	A/AA	1.3.1, 2.4.6
4	STAS-F04	Unlabelled Form Fields	A/AA	1.1.1, 1.3.1, 1.3.5, 2.5.3, 3.3.2, 4.1.2
5	STAS-F05	Ambiguous Form Fields	A/AA	1.1.1, 1.3.1, 1.3.5, 3.3.2, 4.1.2
6	STAS-F06	Empty Button	A/AA	1.1.1, 1.3.1, 1.3.5, 3.3.2, 4.1.2
7	STAS-F07	Ambiguous Button Labelling	A/AA	1.1.1, 1.3.1, 1.3.5, 3.3.2, 4.1.2
8	STAS-F08	Non-Descriptive Link Text	A	1.3.1, 2.4.4
9	STAS-F09	Empty links	A	2.4.4
10	STAS-F10	Mouse Dependant Areas	A/AA	2.1.1, 1.4.13
11	STAS-F11	Video and Audio missing Text Alternatives	A	1.1.1, 1.2.1, 1.2.2, 1.2.3
12	STAS-F12	Video missing Audio Description	A/AA	1.2.3, 1.2.5
13	STAS-F13	Missing Alt Text	A/AA	1.1.1, 1.4.5
14	STAS-F14	Visible Label and Accessible Name Inconsistency	A/AA	1.1.1, 1.3.1, 2.5.3, 1.3.5, 3.3.2, 4.1.2
15	STAS-F15	Non-Descriptive Page Titles	A	2.4.2
16	STAS-F16	Duplicate ID's	A	4.1.1
17	STAS-F17	HTML Markup Errors	A	4.1.1, 4.1.2
18	STAS-F18	Inaccessible Non-HTML Documents	A	1.1.1, 1.3.1, 2.4.2
19	STAS-F19	Insufficient Colour Contrast	AA	1.4.3, 1.4.11
20	STAS-F20	Elements not Visible in Focus	AA	2.4.7
21	STAS-F21	Obscured Text	AA	1.4.4

Priority A Issues

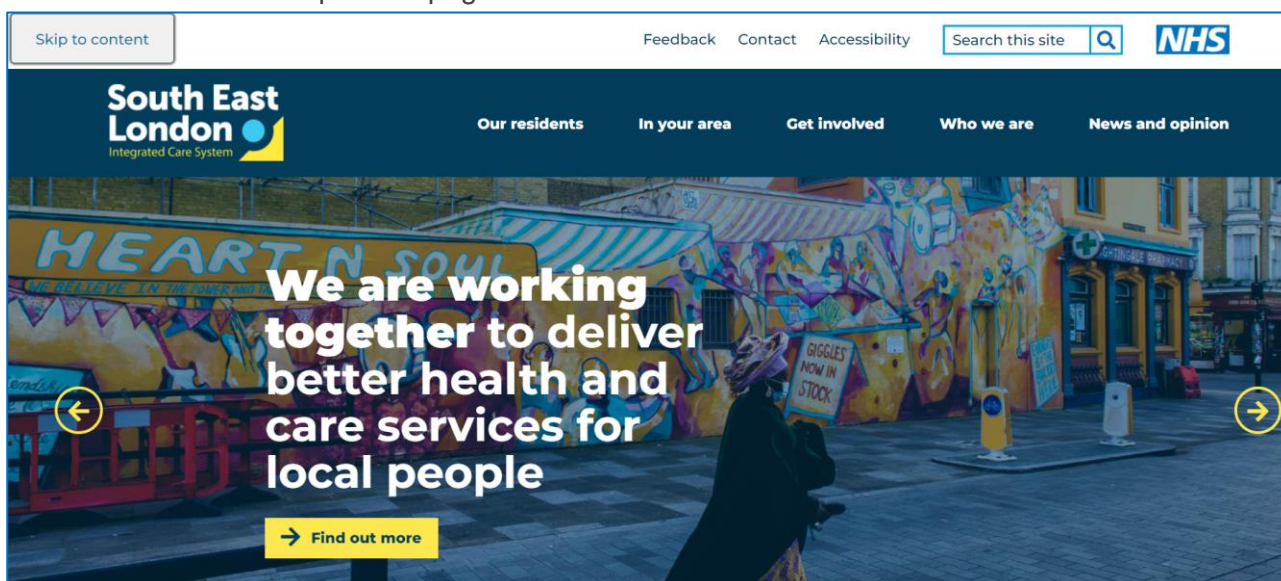
STAS-F01: Non-Functioning ‘Skip’ Navigation

Description

The purpose of skip navigation is to provide a mechanism to bypass blocks of material that are repeated on multiple web pages by skipping directly to the main content of the web page. One of the first interactive items on a web page should be a link to the beginning of the main content. Activating the link sets focus beyond the repeated content to the main content of the page.

When ‘Skip’ Navigation is present, but not functioning correctly, screen reader users have to listen to content on pages visited on the website, and keyboard only users would have to tab through all the links until they arrive at the main content of the page. Ideally, the ‘skip’ to content link should take the user to just above the header of the main content at the top left hand side.

There is currently a skip to content link that does not skip the user to the main content of the homepage, instead, the focus stays on the ‘Skip to content’ link and does not move the page. This is the case on multiple web pages.



User Comments

“I was unable to access a ‘Skip’ navigation link on the pages that I tested. Including a working ‘skip’ link, would enable me to move through the page in a similar fashion to that of a mouse user by passing repeated content.”

Kevin James
Keyboard Only Assessor

“When someone activates a 'Skip to content' link the expectation is that the cursor will land on the main information provided. The frustration of making something more difficult to navigate the page while there is a facility to make it easier. The 'Skip' link is a great feature; however, if the feature does not work, or lands the person in the wrong part of the page, then it becomes frustrating for them; as it is there, but does not work.

A good 'Skip' feature assists visitors in navigating to the main information on the page, and improves the functionality of the website.”

Alan Sleat
Screen Reader Assessor

Occurrences

This issue occurs throughout the site.

Example Occurrences

<https://selondonics.wpengine.com/>

<https://selondonics.wpengine.com/in-your-area/lambeth/>

<https://selondonics.wpengine.com/our-team/name-surname-2/>

<https://selondonics.wpengine.com/our-team/name-surname-3/>

<https://selondonics.wpengine.com/who-we-are/working-for-us/>

Action Required

1. Ensure the skip navigation link functions as intended.
2. Ensure that the skip navigation links appears as the first focusable items on a page.

WCAG References

2.4.1 Bypass Blocks: A mechanism is available to bypass blocks of content that are repeated on multiple Web pages. (Level A)

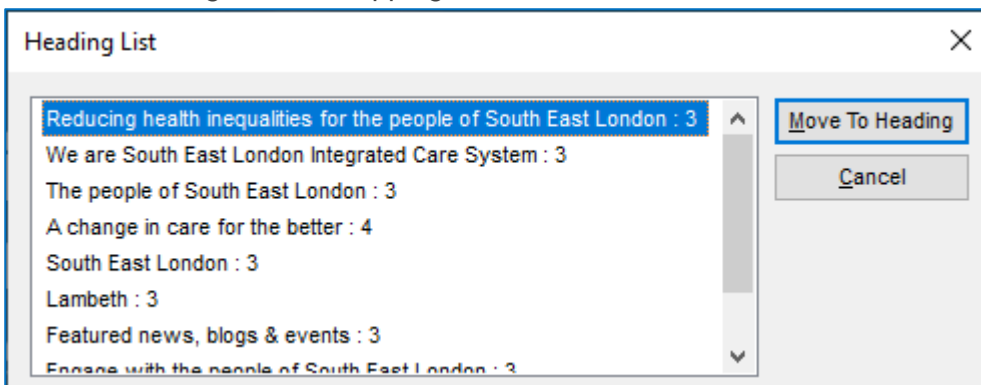
STAS-F02: Incorrect Heading Structure

Description

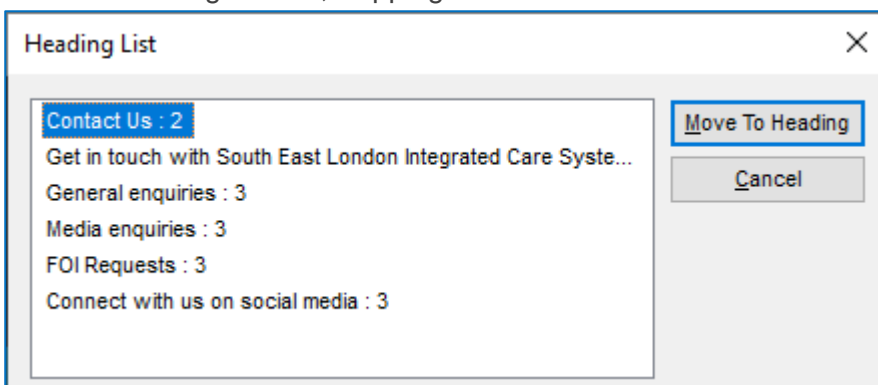
Screen reader and other assistive technology users have the ability to navigate web pages by heading structure. This means that the user can read or jump directly to top level elements (<h1>), next level elements (<h2>), third level elements (<h3>), and so on. Viewing or listening to this outline should give them a good idea of the contents and structure of the page.

There are multiple pages on the website that contain an illogical heading structure.

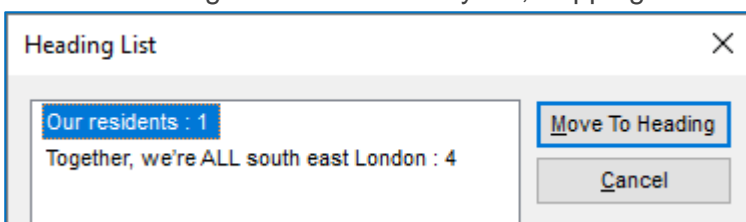
On the homepage, there is an illogical heading structure. The first heading is a H3, skipping H1 and H2.



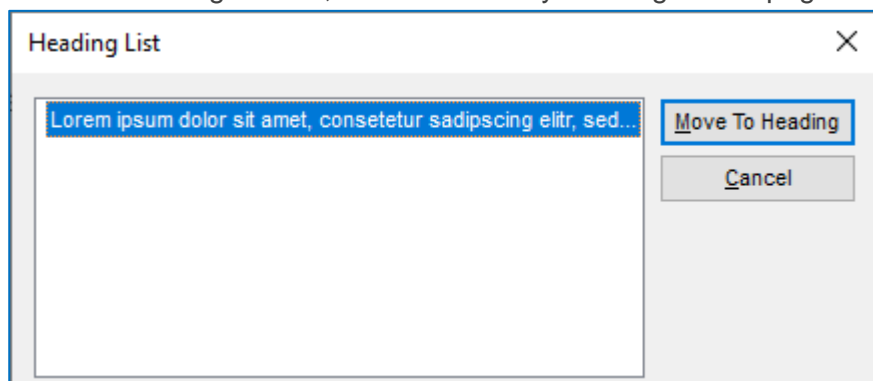
On the 'Contact us' page, there is an illogical heading structure. The first heading is a H2, skipping H1.



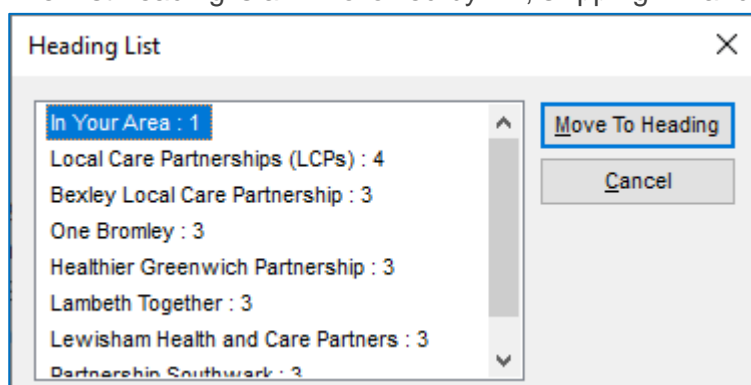
On the 'Our residents' page, there is an illogical heading structure. The first heading is a H1 followed by H4, skipping H2 and H3.



On the 'Claire's story' page, there is an illogical heading structure. The first heading is a H3, which is the only heading on the page.



On the 'In your area' page, there is an illogical heading structure. The first heading is a H1 followed by H4, skipping H2 and H3.



User Comments

“The headings, as they are on some pages, make it difficult for a screen reader user to navigate around the page.

The benefit of a logical heading structure is that the user will be able to quickly skip through the headings and view what the contents of the page holds. In addition, making a logical structure, by using numerical headings of importance. The change will enable the user to find any information in a more comprehensive way.”

Alan Sleat
Screen Reader Assessor

Occurrences

This issue occurs throughout the site.

Example Occurrences

<https://selondonics.wpengine.com/>

<https://selondonics.wpengine.com/who-we-are/contact-us/>

<https://selondonics.wpengine.com/our-residents/#content>

<https://selondonics.wpengine.com/stories/claires-story/#content>

<https://selondonics.wpengine.com/in-your-area/>

Action Required

1. Ensure that all pages contain a heading 1.
2. Ensure that all heading on a page follow a logical structure.
3. Ensure that the heading structure represents the information structure of the page

WCAG References

1.3.1 Info and Relationships: Information, structure, and relationships conveyed through presentation can be programmatically determined or are available in text. (Level A)

2.4.6 Headings and Labels: Headings and labels describe topic or purpose. (Level AA)

Further Information

Heading structure should follow a logical, numerical order, and example of this can be seen below. It should always begin with a heading 1.

```
<h1>Colours
  <h2>Shades of Red
    <h3>Crimson
    <h3>Ruby
  <h2>Shades of Blue
    <h3>Aqua
    <h3>Aquamarine
  <h2>Shades of Green
    <h3>Harlequin
    <h3>Olive
```

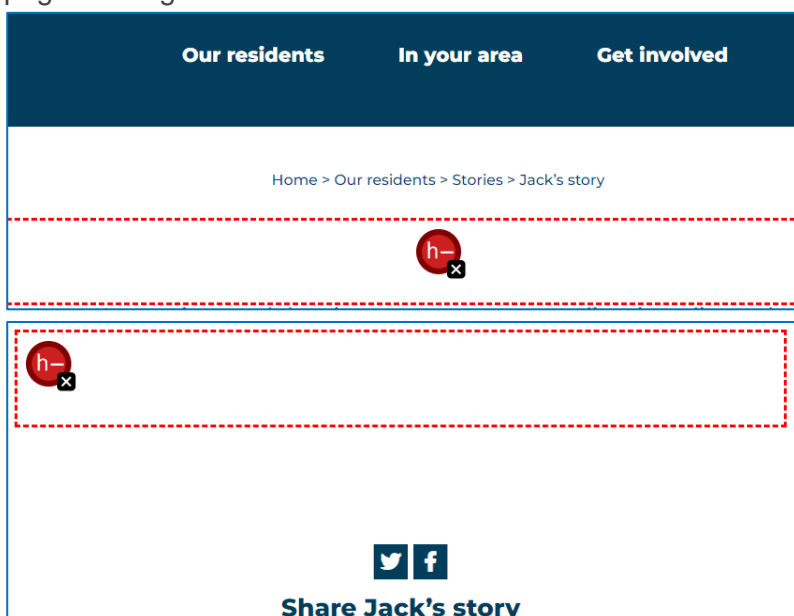
STAS-F03: Empty Headings

Description

Screen reader and other assistive technology users have the ability to navigate web pages by structure. This means that the user can read or jump directly to top level elements (<h1>), next level elements (<h2>), third level elements (<h3>), and so on. Viewing or listening to this outline should give them a good idea of the contents and structure of the page. There are empty headings on some pages. This may mean that screen reader users spend time looking for content that is not there.

There were empty headings on several of the pages tested throughout the website.

On the 'stories/jacks-story' page there are 2 empty headings. These issues are present on multiple pages throughout the site.



On the '1-million-south-east-londoners-boost-their-immunity-against-covid-19' page there is 1 empty heading.



User Comments

“There were several pages where ‘empty headings’ were found. Not all screen reader software will ignore empty headings, if the heading tags are empty, this can cause confusion for screen reader users. “

Alan Sleat
Screen Reader Assessor

Occurrences

This issue occurs throughout the site.

Example Occurrences

<https://selondonics.wpengine.com/stories/jacks-story/>
<https://selondonics.wpengine.com/stories/claires-story-2/>
<https://selondonics.wpengine.com/stories/beths-story-2/>
<https://selondonics.wpengine.com/lambeth-together-strategic-board/>
<https://selondonics.wpengine.com/events/one-million-vaccinations-given-in-south-east-london/>

Action Required

1. Ensure that all headings contain content.

WCAG References

1.3.1 Info and Relationships: Information, structure, and relationships conveyed through presentation can be programmatically determined or are available in text. (Level A)

2.4.6 Headings and Labels: Headings and labels describe topic or purpose. (Level AA)

Further Information

Give all headings meaningful content so users can find what they are looking for and not waste their time searching for areas that do not exist. A code example can be seen below:

<code><h1>Disaster preparation</h1></code>	Correct
<code><h1> </h1></code>	Incorrect

STAS-F04: Unlabelled Form Fields

Description

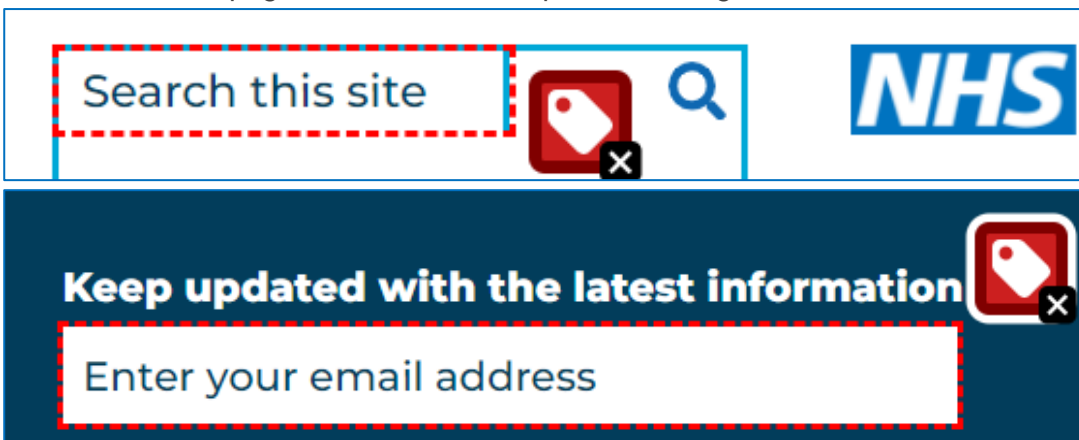
Providing a descriptive form field label will allow users to know what information to enter in a form field. Where a series of form fields relate to similar information, the context of the form fields needs to be included in the field description.

If Radio buttons and Checkboxes allow users to make selections from a set of options, they should be enclosed with a fieldset; this will allow users of assistive technology to be aware that the options presented relate to a group.

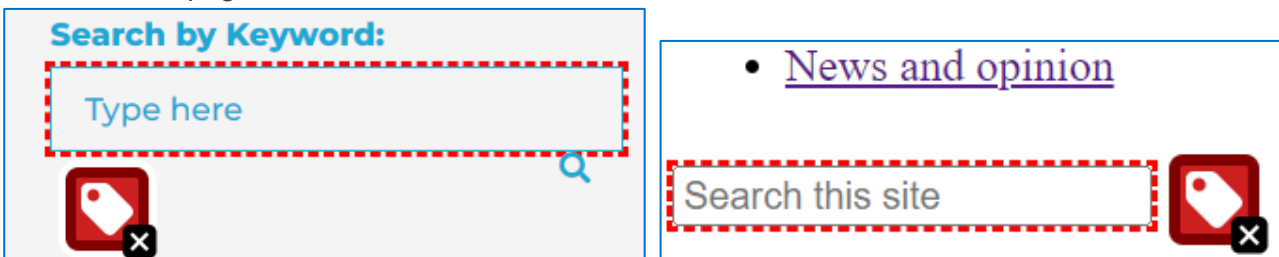
Some users will disable CSS, or apply their own style sheets to remove any background images or colours, to simplify the look of text to improve readability of the content. When the CSS is disabled, many of the pages display a text box with no labelling present, example occurrences of this can be seen on the

There were multiple pages that had unlabelled form fields present throughout the website.

On the 'our-residents/stories' page there are 2 unlabelled form fields, one near the logo, and one at the bottom of the page. These issues are present throughout the site.



On the 'news' page there are 2 more unlabelled form fields.



User Comments

"When there are any fields that are not sufficiently labelled it will be very difficult, or impossible for the information to be successfully submitted. All form fields need to be labelled clearly. This will allow a screen reader user to have all the information needed to complete any process. When all form fields are clearly labelled, then it is not only beneficial to the visitor, but also for the site owners; as correct information will get to them."

Alan Sleat
Screen Reader Assessor

Occurrences

This issue occurs throughout the site.

Example Occurrences

<https://selondonics.wpengine.com/our-residents/stories/>

<https://selondonics.wpengine.com/events/>

<https://selondonics.wpengine.com/news/>

Action Required

1. Ensure that all forms are labelled clearly and have correctly associated label tags.
2. Ensure fieldsets and legends are used correctly where appropriate.

Note: placeholder text within an input field or a title is not considered an appropriate means of providing a label.

WCAG References

1.1.1 Non-text Content: All non-text content that is presented to the user has a text alternative that serves the equivalent purpose, except for the situations listed below. (Level A)

- **Controls, Input:** If non-text content is a control or accepts user input, then it has a name that describes its purpose. (Refer to Guideline 4.1 for additional requirements for controls and content that accepts user input.)

1.3.1 Info and Relationships: Information, structure, and relationships conveyed through presentation can be programmatically determined or are available in text. (Level A)

1.3.5 Identify Input Purpose: The purpose of each input field collecting information about the user can be programmatically determined when: (Level AA)

- The input field serves a purpose identified in the Input Purposes for User Interface Components section; and
- The content is implemented using technologies with support for identifying the expected meaning for form input data.

2.5.3 Label in Name: For user interface components with labels that include text or images of text, the name contains the text that is presented visually. (Level A)

3.3.2 Labels or Instructions: Labels or instructions are provided when content requires user input. (Level A)

4.1.2 Name, Role, Value: For all user interface components (including but not limited to: form elements, links and components generated by scripts), the name and role can be programmatically determined; states, properties, and values that can be set by the user can be programmatically set; and notification of changes to these items is available to user agents, including assistive technologies. (Level A)

Note: This success criterion is primarily for Web authors who develop or script their own user interface components. For example, standard HTML controls already meet this success criterion when used according to specification.

Further Information

Providing the correct label tag is important to indicate to users the purpose of the form field. An example of a form with correct label tags can be seen below:

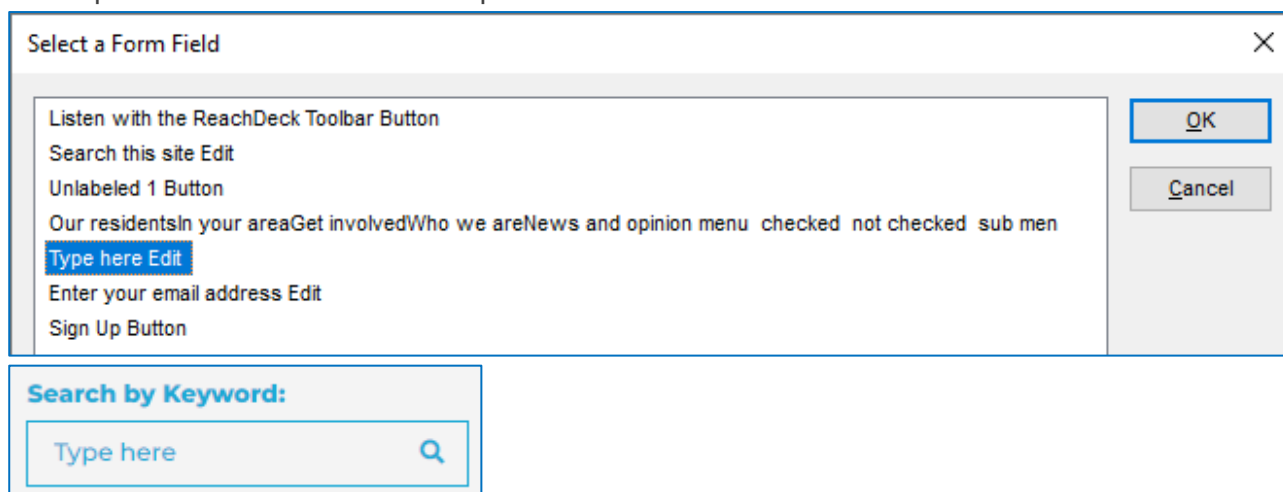
```
<form action="demo_form.asp">
  <label for="male">Male</label>
  <input type="radio" name="gender" id="male" value="male"><br>
  <label for="female">Female</label>
  <input type="radio" name="gender" id="female" value="female"><br>
  <label for="other">Other</label>
  <input type="radio" name="gender" id="other" value="other"><br><br>
  <input type="submit" value="Submit">
</form>
```

STAS-F05: Ambiguous Form Fields

Description

Providing a descriptive form field label will allow users to know what information to enter in a form field. Where a series of form fields relate to similar information, the context of the form fields needs to be included in the field description. The form field label should also show how it relates to other items in the form.

On the 'News' page, there is an edit box ambiguously labelled 'Type here' which does not help the user input the correct information required.



The image shows two screenshots. The top one is a dialog box titled "Select a Form Field" with a close button (X) in the top right corner. It contains a list of form fields with their labels and edit options:

- Listen with the ReachDeck Toolbar Button
- Search this site Edit
- Unlabeled 1 Button
- Our residents in your area Get involved Who we are News and opinion menu checked not checked sub men
- Type here Edit (highlighted with a blue box)
- Enter your email address Edit
- Sign Up Button

On the right side of the dialog box, there are "OK" and "Cancel" buttons. The bottom screenshot shows a search box with the text "Search by Keyword:" above it. The search input field contains the text "Type here" and has a magnifying glass icon on the right.

User Comments

"When there are any fields that are not sufficiently labelled it will be very difficult, or impossible for the information to be successfully submitted. All form fields need to be labelled clearly. This will allow a screen reader user to have all the information needed to complete any process. When all form fields are clearly labelled, then it is not only beneficial to the visitor, but also for the site owners; as correct information will get to them."

Alan Sleat
Screen Reader Assessor

Example Occurrences

<https://selondonics.wpengine.com/news/>

Action Required

1. Ensure that all forms are labelled clearly.
2. Ensure fieldsets and legends are used correctly where appropriate.

Note: placeholder text within an input field or a title is not considered an appropriate means of providing a label.

WCAG References

1.1.1 Non-text Content: All non-text content that is presented to the user has a text alternative that serves the equivalent purpose, except for the situations listed below. (Level A)

- **Controls, Input:** If non-text content is a control or accepts user input, then it has a name that describes its purpose. (Refer to Guideline 4.1 for additional requirements for controls and content that accepts user input.)

1.3.1 Info and Relationships: Information, structure, and relationships conveyed through presentation can be programmatically determined or are available in text. (Level A)

1.3.5 Identify Input Purpose: The purpose of each input field collecting information about the user can be programmatically determined when: (Level AA)

- The input field serves a purpose identified in the Input Purposes for User Interface Components section; and
- The content is implemented using technologies with support for identifying the expected meaning for form input data.

3.3.2 Labels or Instructions: Labels or instructions are provided when content requires user input. (Level A)

4.1.2 Name, Role, Value: For all user interface components (including but not limited to: form elements, links and components generated by scripts), the name and role can be programmatically determined; states, properties, and values that can be set by the user can be programmatically set; and notification of changes to these items is available to user agents, including assistive technologies. (Level A)

Note: This success criterion is primarily for Web authors who develop or script their own user interface components. For example, standard HTML controls already meet this success criterion when used according to specification.

Further Information

Fieldsets can be used to connect a question to a set of radio buttons or checkboxes, but can also be used to group related fields and remove ambiguity.

```
<form>
  <fieldset>
    <legend>Choose your favourite monster</legend>

    <input type="radio" id="kraken" name="monster">
    <label for="kraken">Kraken</label><br/>

    <input type="radio" id="sasquatch" name="monster">
    <label for="sasquatch">Sasquatch</label><br/>

    <input type="radio" id="mothman" name="monster">
    <label for="mothman">Mothman</label>
  </fieldset>
</form>
```

Choose your favourite monster

Kraken

Sasquatch

Mothman

Notice how the fieldset has grouped together the input areas for an answers details.

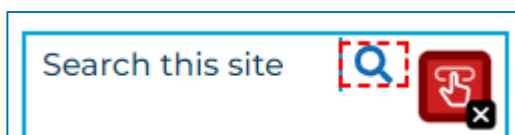
STAS-F06: Empty Button

Description

When navigating to a button, descriptive text must be presented to screen reader users to indicate the function of the button.

Providing descriptive button labelling will allow users to make an informed decision whether to activate a button or not.

On the homepage, there is an empty button in the search bar. This issue is present on every page tested.



Occurrences

This issue occurs throughout the site.

Example Occurrences

<https://selondonics.wpengine.com/our-team/name-surname-2/>

<https://selondonics.wpengine.com/who-we-are/working-for-us/>

<https://selondonics.wpengine.com/our-team/name-surname-3/>

<https://selondonics.wpengine.com/lambeth-together-strategic-board-6/>

<https://selondonics.wpengine.com/>

Action Required

1. Ensure that all forms elements are labelled clearly.

WCAG References

1.1.1 Non-text Content: All non-text content that is presented to the user has a text alternative that serves the equivalent purpose, except for the situations listed below. (Level A)

- **Controls, Input:** If non-text content is a control or accepts user input, then it has a name that describes its purpose. (Refer to Guideline 4.1 for additional requirements for controls and content that accepts user input.)

1.3.1 Info and Relationships: Information, structure, and relationships conveyed through presentation can be programmatically determined or are available in text. (Level A)

1.3.5 Identify Input Purpose: The purpose of each input field collecting information about the user can be programmatically determined when: (Level AA)

- The input field serves a purpose identified in the Input Purposes for User Interface Components section; and
- The content is implemented using technologies with support for identifying the expected meaning for form input data.

3.3.2 Labels or Instructions: Labels or instructions are provided when content requires user input. (Level A)

4.1.2 Name, Role, Value: For all user interface components (including but not limited to: form elements, links and components generated by scripts), the name and role can be programmatically determined; states, properties, and values that can be set by the user can be programmatically set; and notification of changes to these items is available to user agents, including assistive technologies. (Level A)

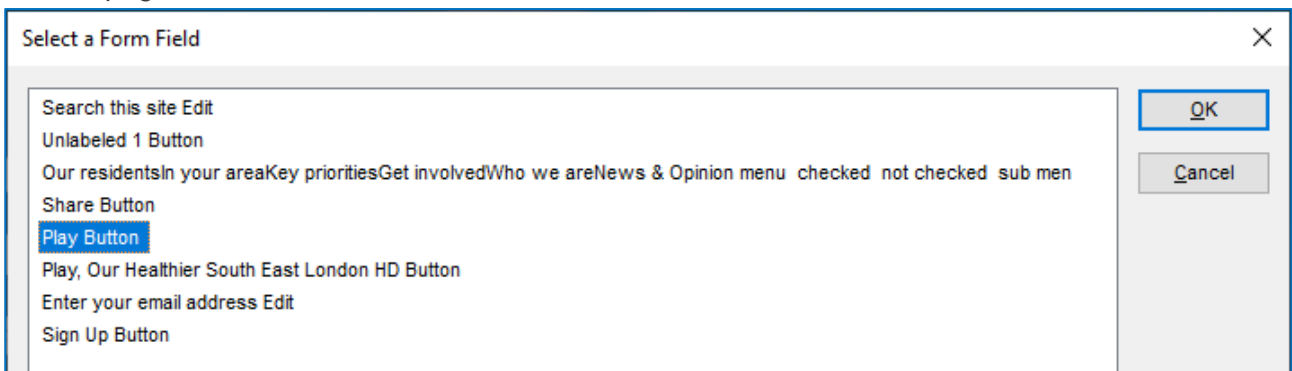
Note: This success criterion is primarily for Web authors who develop or script their own user interface components. For example, standard HTML controls already meet this success criterion when used according to specification.

STAS-F07: Ambiguous Button Labelling

Description

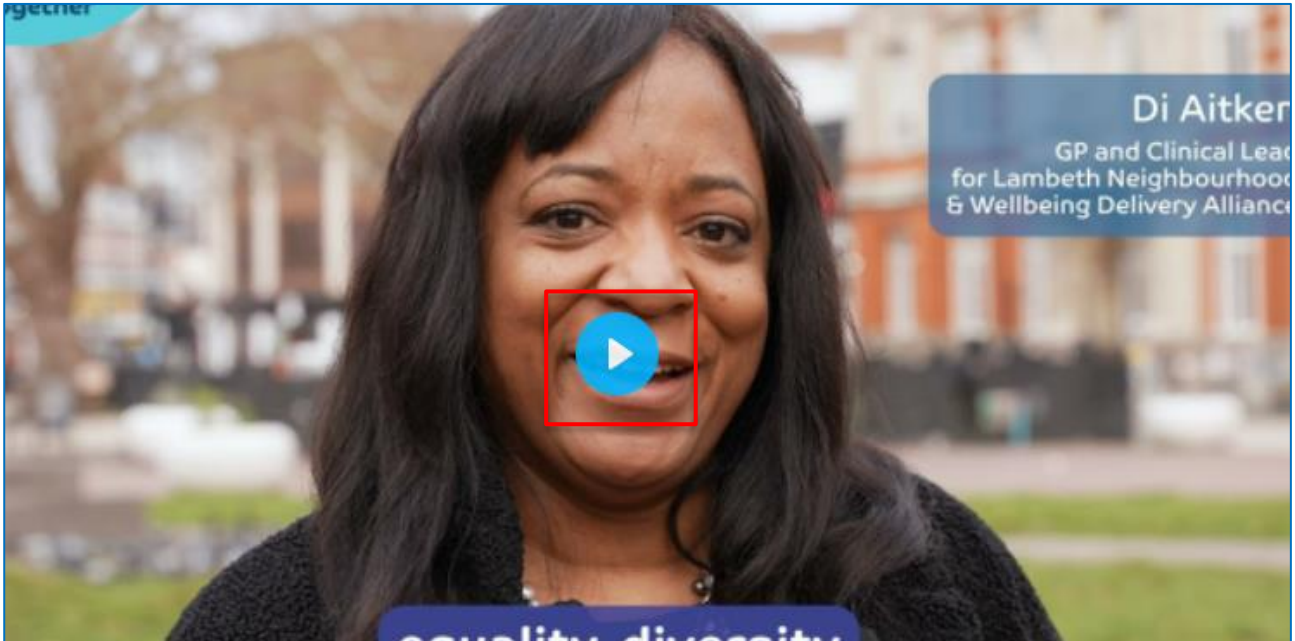
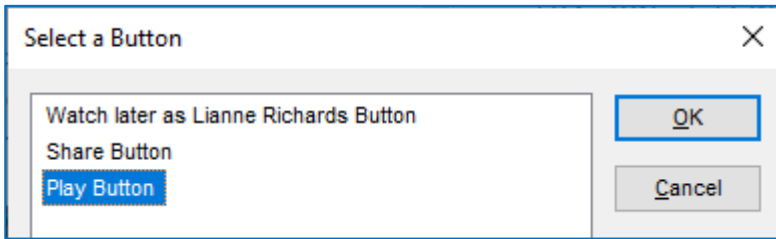
Providing descriptive button labelling will allow users to know what information to enter in a form field. Providing descriptive button labelling will allow users to know what information to expect when the button is activated.

On the homepage, there is a button ambiguously labelled 'Play'. A screen reader will not know what is going to be played on activation. This video is with ambiguous labelling is apparent on several pages tested.



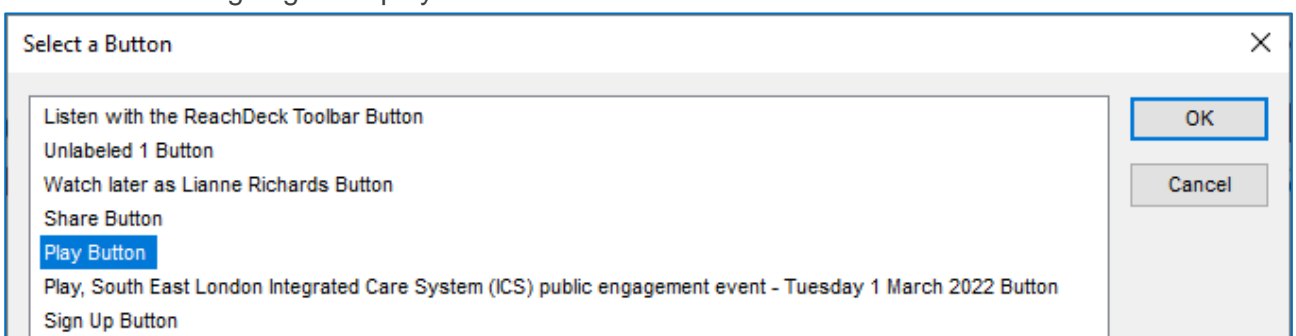
```
<button type="button" class="plyr__control plyr__control--overlaid" data-plyr="play" aria-label="Play, Our Healthier South East London HD">  
  <svg aria-hidden="true" focusable="false">  
    <use href="#plyr-play"></use>  
  </svg>  
  <span class="plyr__sr-only">Play</span> == $0  
</button>
```

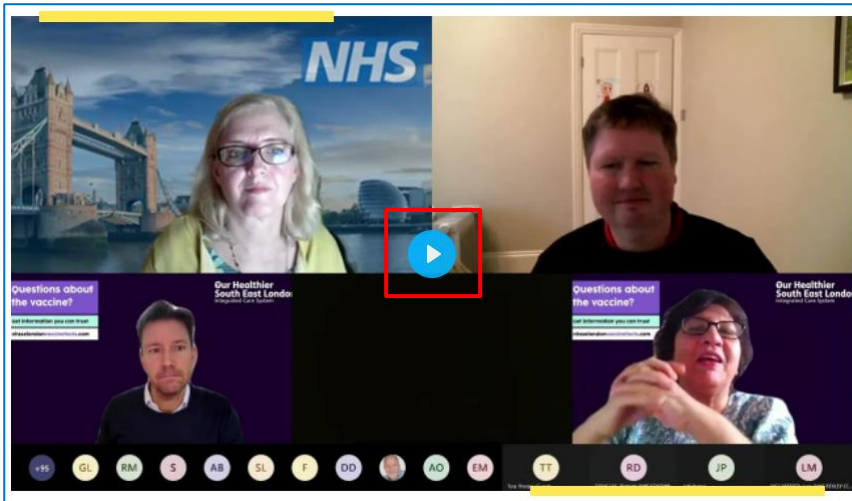

On the 'Lambeth Together' page, there is a button ambiguously labelled 'Play'. A screen reader will not know what is going to be played on activation.



```
<button type="button" class="plyr__control plyr__control--overlaid" data-plyr="play" aria-label="Play, Lambeth Together Care Partnership: Our Pledge">  
  <svg aria-hidden="true" focusable="false">  
    <use href="#plyr-play"></use>  
  </svg>  
  <span class="plyr__sr-only">Play</span> == $0  
</button>
```

On the 'Residents given the opportunity to find out more about the creation of a new statutory integrated care system' page, there is a button ambiguously labelled 'Play'. A screen reader will not know what is going to be played on activation.





User Comments

“When there are any fields or buttons that are not sufficiently labelled it will be very difficult, or impossible for the information to be successfully submitted. All form fields and buttons need to be labelled clearly. This will allow a screen reader user to have all the information needed to complete any process. When all form fields are clearly labelled, then it is not only beneficial to the visitor, but also for the site owners; as correct information will get to them.”

Alan Sleat
Screen Reader Assessor

Occurrences

This issue occurs throughout the site.

Example Occurrences

<https://selondonics.wpengine.com/>

<https://selondonics.wpengine.com/who-we-are/what-is-an-ics/>

<https://selondonics.wpengine.com/who-we-are/sustainability/>

<https://selondonics.wpengine.com/in-your-area/lambeth/>

<https://selondonics.wpengine.com/residents-given-the-opportunity-to-find-out-more-about-the-creation-of-a-new-statutory-integrated-care-system/>

Action Required

1. Ensure that all forms elements are labelled clearly.
2. Where the button is present on content provided by a third party, such as YouTube, a note should be added to the accessibility statement

WCAG References

1.1.1 Non-text Content: All non-text content that is presented to the user has a text alternative that serves the equivalent purpose, except for the situations listed below. (Level A)

- **Controls, Input:** If non-text content is a control or accepts user input, then it has a name that describes its purpose. (Refer to Guideline 4.1 for additional requirements for controls and content that accepts user input.)

1.3.1 Info and Relationships: Information, structure, and relationships conveyed through presentation can be programmatically determined or are available in text. (Level A)

1.3.5 Identify Input Purpose: The purpose of each input field collecting information about the user can be programmatically determined when: (Level AA)

- The input field serves a purpose identified in the Input Purposes for User Interface Components section; and
- The content is implemented using technologies with support for identifying the expected meaning for form input data.

3.3.2 Labels or Instructions: Labels or instructions are provided when content requires user input. (Level A)

4.1.2 Name, Role, Value: For all user interface components (including but not limited to: form elements, links and components generated by scripts), the name and role can be programmatically determined; states, properties, and values that can be set by the user can be programmatically set; and notification of changes to these items is available to user agents, including assistive technologies. (Level A)

Note: This success criterion is primarily for Web authors who develop or script their own user interface components. For example, standard HTML controls already meet this success criterion when used according to specification.

STAS-F08: Non-Descriptive Link Text

Description

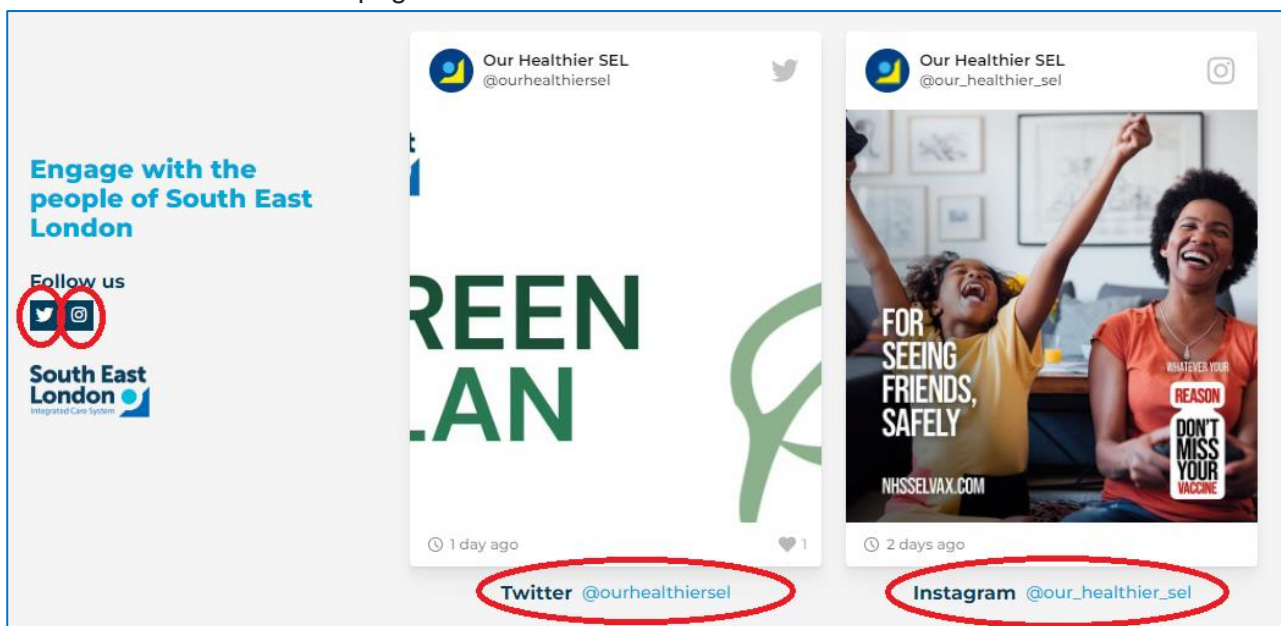
The text of a link should describe the destination of the link and the link's purpose. Providing a descriptive link text will allow users to easily determine the function of the link and make educated decisions to click the link or not.

If it is not possible to identify the purpose of the link from the link text itself, then this information should be provided in context.

Screen reader users have the ability to display and navigate by lists of elements, or jump from element to element. Navigating this way is much quicker than listening to a whole page, however the context provided by paragraphs and other narrative is lost and non-descriptive links become harder to understand.

For downloadable links, we recommend that the file type and size of the file is also included in the link text to allow the user to make a decision whether or not to download the file.

On the homepage there are 7 non-descriptive links with an aria-label of 'link opens in new tab/window'. The aria-label replaces the link content with the label making these links identical. This is an issue on several pages tested.

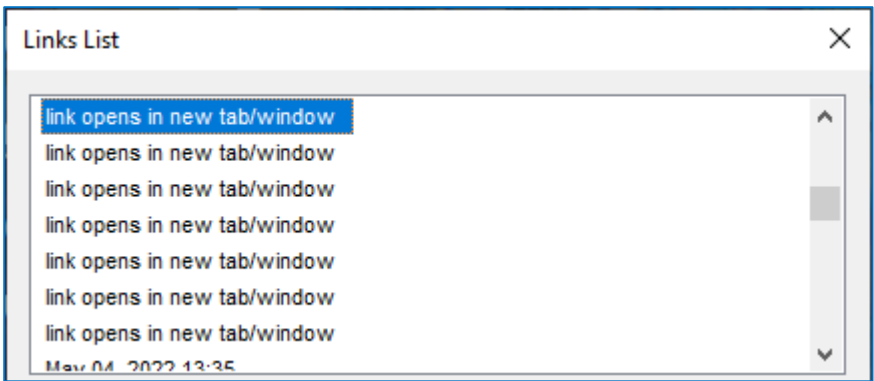


```
▶ <a href="https://twitter.com/ourhealthiersel" target="_blank" aria-label="link opens in new tab/window">...</a>
```

```
▶ <a href="https://www.instagram.com/our_healthier_sel" target="_blank" aria-label="link opens in new tab/window">...</a>
```

```
<a href="https://twitter.com/ourhealthiersel" target="_blank" aria-label="link opens in new tab/window">@ourhealthiersel</a>
```

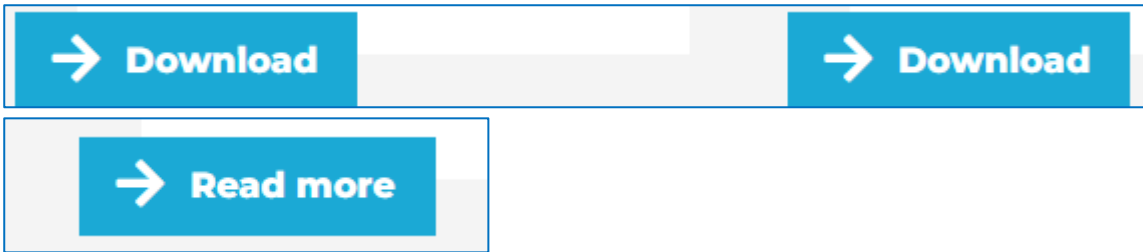
```
<a href="https://www.instagram.com/our_healthier_sel" target="_blank" aria-label="link opens in new tab/window">@our_healthier_sel</a>
```



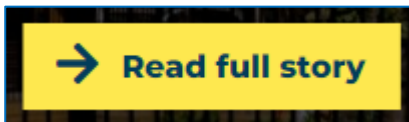
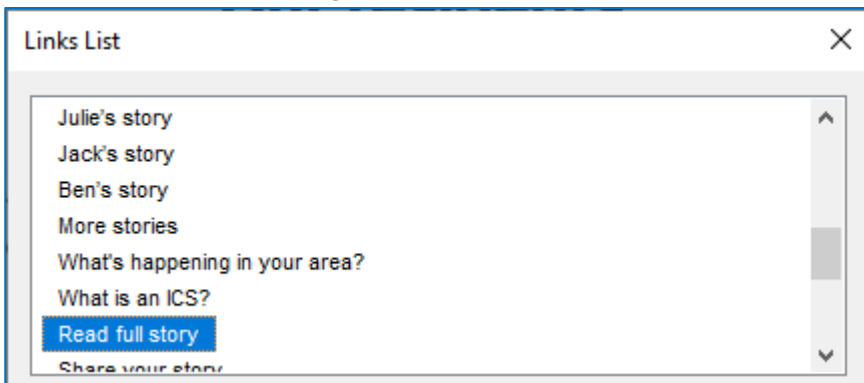
Furthermore, there are 6 non-descriptive links labelled 'Find out more'.



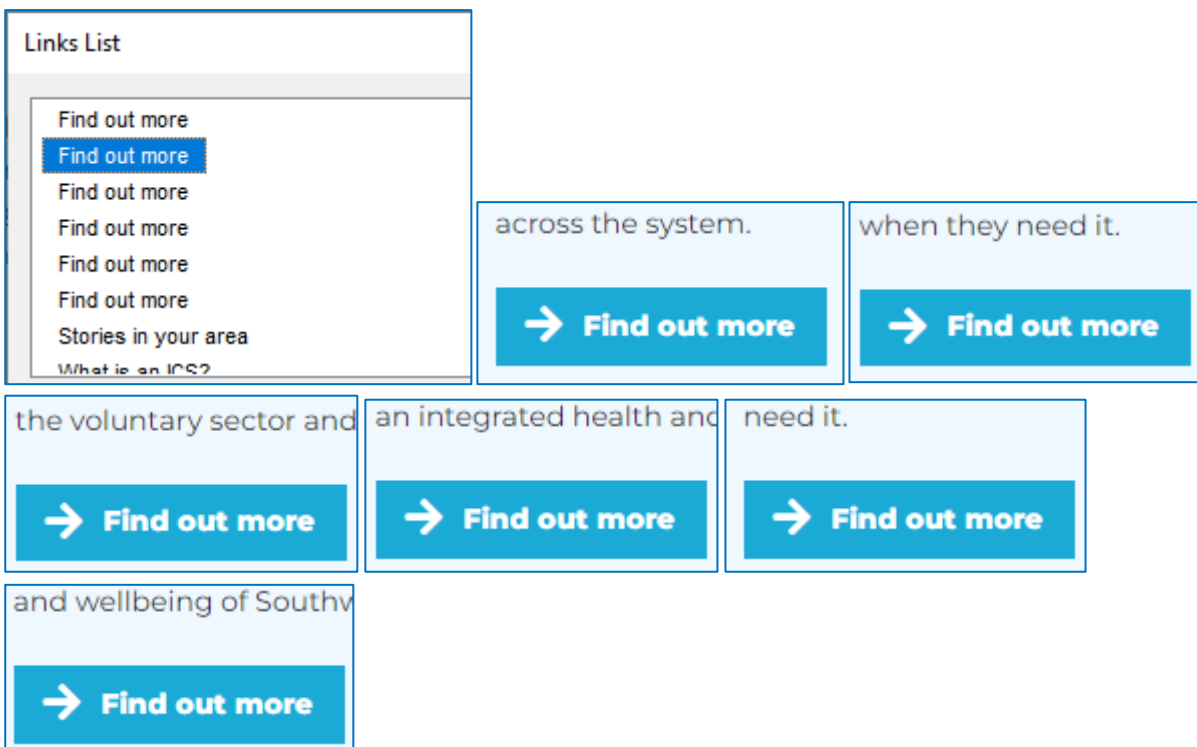
On the 'partners/icp-icb/' page there are 2 non-descriptive links labelled 'Download' and 1 non-descriptive link labelled 'Read more'. These are present on multiple pages on the site.



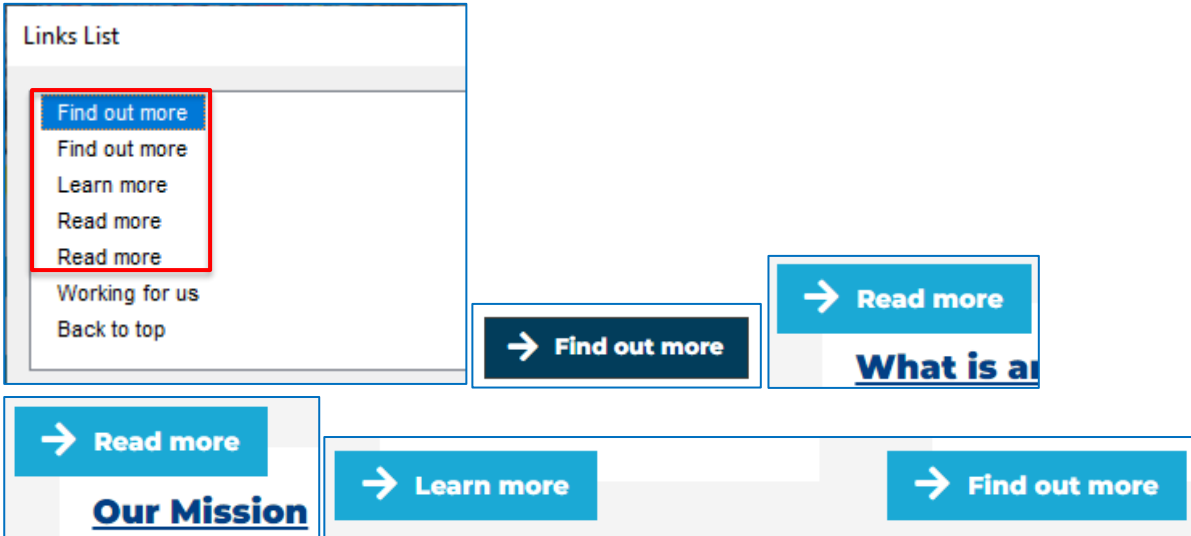
On the 'Our residents' page, there is a non-descriptive link labelled 'Read full story'.



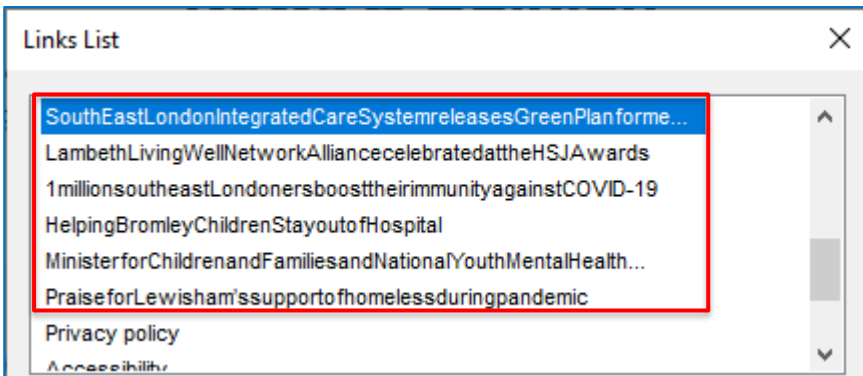
On the 'In Your area' page, there are 6 non-descriptive links labelled 'Find out more' that lead to different destinations.



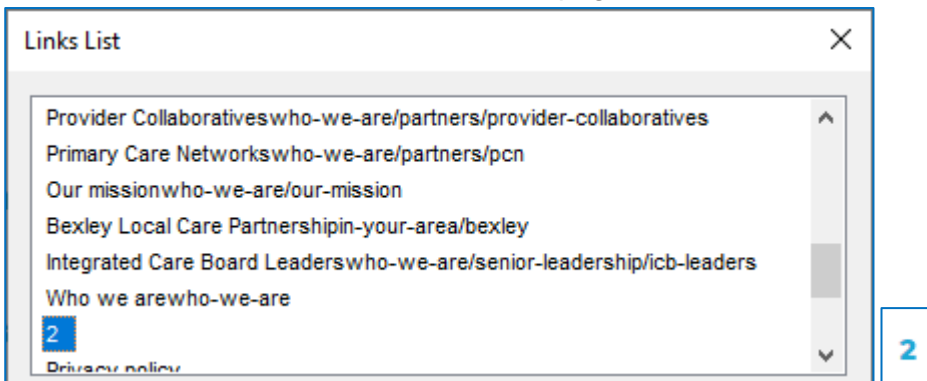
On the 'Who we are' page, there are 2 non-descriptive links labelled 'Find out more', 2 labelled 'Read more' and a non-descriptive link labelled 'Learn more'.



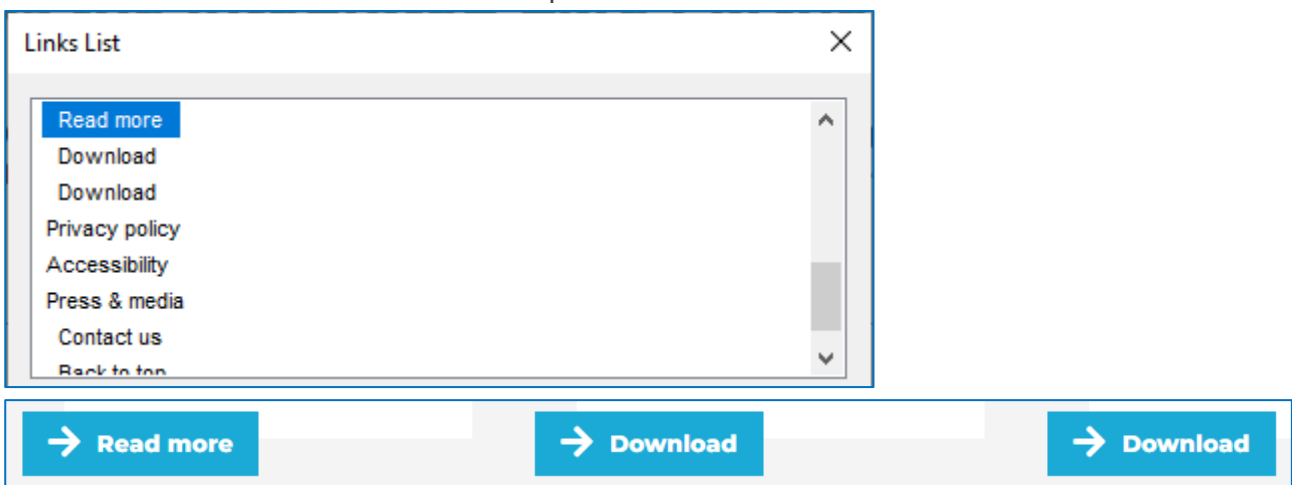
On the 'News' page, there are several links that have non-descriptive labelling. An attempt has been made to make the links descriptive, however, there is no spacing between the words in the link text which results in several being nonsensical when read aloud by a screen reader. This issue is apparent on several pages tested.



On the 'Search results for the term: 'event' page, there is a non-descriptive link labelled '2'.



On the 'Integrated Care Partnership and Integrated Care Board' page there is a non-descriptive link labelled 'Read more' and 2 non-descriptive links labelled 'Download'.



User Comments

“A link on the site that is labelled with no description makes it tough to determine whether to activate it, or not. A well labelled, working link will assist all users to locate a page, or start the process to finding the information they require. A poorly labelled link will leave the user wondering where the link will take them; or asking the question, 'Is this the right page?'

The correct labelling of links will give the user a quick and easy journey to the required information.”

Alan Sleat
Screen Reader Assessor

Occurrences

This issue occurs throughout the site.

Example Occurrences

- <https://selondonics.wpengine.com/>
- <https://selondonics.wpengine.com/our-residents/#content>
- <https://selondonics.wpengine.com/in-your-area/>
- <https://selondonics.wpengine.com/who-we-are/>
- <https://selondonics.wpengine.com/news/>
- <https://selondonics.wpengine.com/?s=event>
- <https://selondonics.wpengine.com/who-we-are/partners/icp-icb/>

Action Required

1. Ensure the purpose of links can be determined from immediate context.
2. Provide additional context to links using CSS, ARIA-label or ARIA-describedby
3. Ensure links to non-HTML documents include file type and file size within the link text.
4. Where ARIA is used to provide context, ensure that the visual label appears in the aria label.

WCAG References

1.3.1 Info and Relationships: Information, structure, and relationships conveyed through presentation can be programmatically determined or are available in text. (Level A)

2.4.4 Link Purpose (In Context): The purpose of each link can be determined from the link text alone or from the link text together with its programmatically determined link context, except where the purpose of the link would be ambiguous to users in general. (Level A)

Further Information

Link text should be a clear description to the destination of the link. It should avoid vague content such as 'click here' and 'more information'. More information on how to display links can be found on <http://www.w3.org/TR/UNDERSTANDING-WCAG20/navigation-mechanisms-refs.html>

For links within a paragraph, consider rewording the paragraph to make the links more understandable.

<p>TOWER OF LONDON</p> <p>A 1000-year old fortress, the Tower of London is an iconic landmark in our capital and is the home of the Crown Jewels. Discover the history of this royal palace, prison and fortress and meet the Beefeaters sharing fascinating tales from years ago. Book your tickets here.</p>	<p>TOWER OF LONDON</p> <p>A 1000-year old fortress, the Tower of London is an iconic landmark in our capital and is the home of the Crown Jewels. Discover the history of this royal palace, prison and fortress and meet the Beefeaters sharing fascinating tales from years ago. Book Tower of London Tickets here.</p>
---	---

Where visual amendments to the link cannot be made, consider one of the following methods of providing additional content to the end of the link.

Using CSS

Normal Code

```
<a href='/news/page2.html'>2</a>
```

Adapted Code

```
<a href='/news/page2.html'>  
<span class="sr-only">Go to directory page</span>2</a>
```

CSS

```
sr-only {position: absolute; margin-left: -9999px;}
```

Using ARIA

Normal Code

```
<a href='/news/page2.html'>2</a>
```

Adapted Code

```
<a href='/news/page2.html' aria-label='Go to directory page 2'>2</a>
```

Note: display:none will hide content from screen readers as well as sighted users.

STAS-F09: Empty links

Description

The text of a link should provide a clear description of the link and the link's purpose. Providing descriptive link text will allow users to easily determine the function of the link and make educated decisions to click the link or not. When a link is empty, screen readers will create the text of a link from the URL. This is not always understandable by a user.

There is an empty link on the 'contact-us' page. This issue is present on all pages checked.



User Comments

“There are several pages that have empty links on the page. This can be confusing when tabbing my way through the page, because when I tab away from a link, I lose focus because I expect to be taken to the next visual link on a page.”

Kevin James
Keyboard Only Assessor

Occurrences

This issue occurs throughout the site.

Example Occurrences

<https://selondonics.wpengine.com/who-we-are/contact-us/>
<https://selondonics.wpengine.com/lambeth-together-strategic-board-4/>
<https://selondonics.wpengine.com/lambeth-together-strategic-board-6/>
<https://selondonics.wpengine.com/lambeth-together-strategic-board-2/>
<https://selondonics.wpengine.com/latest-post-2-title-title-lorem-ipsum/>

Action Required

1. Remove empty links

WCAG References

2.4.4 Link Purpose (In Context): The purpose of each link can be determined from the link text alone or from the link text together with its programmatically determined link context, except where the purpose of the link would be ambiguous to users in general. (Level A)

STAS-F10: Mouse Dependant Areas

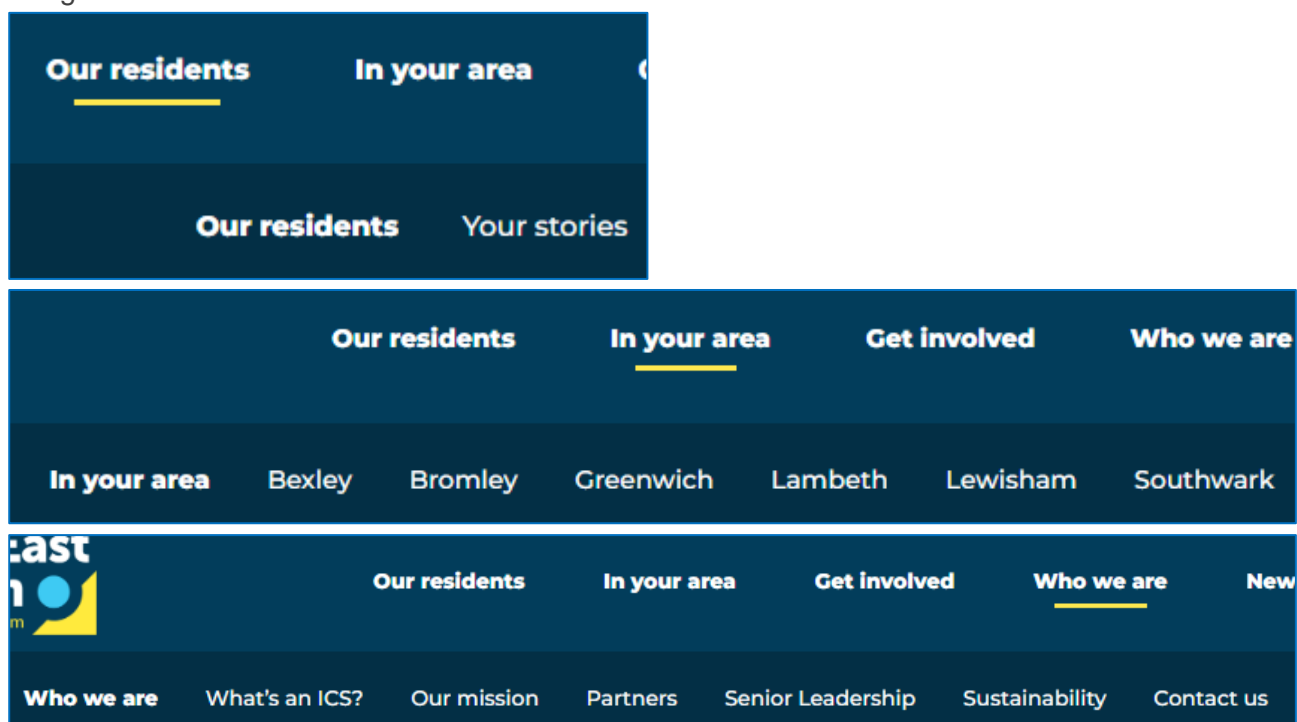
Description

All areas of a website should be accessible to users regardless of their navigation method, whether it is via mouse, keyboard or voice. Websites must accommodate all types of input methods with all areas being accessible to users using any of these types of input.

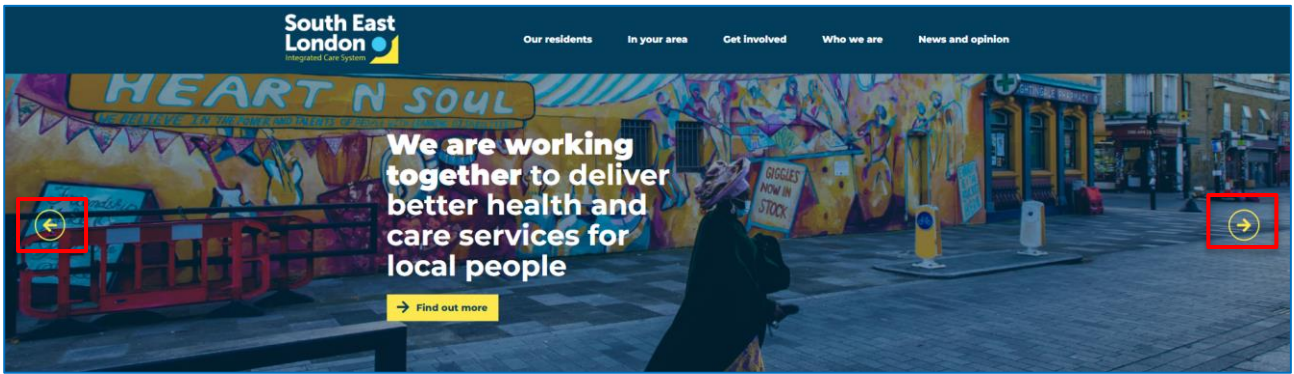
Some sections are easily accessible for a mouse user but this is not the case for a keyboard only users.

Note: Due to the lack of link highlighting across the site, it is difficult to know what is a mouse dependant area and what is a link highlighting issues. Once the focus highlighting issues has been resolved, some new mouse dependant areas might be discovered.

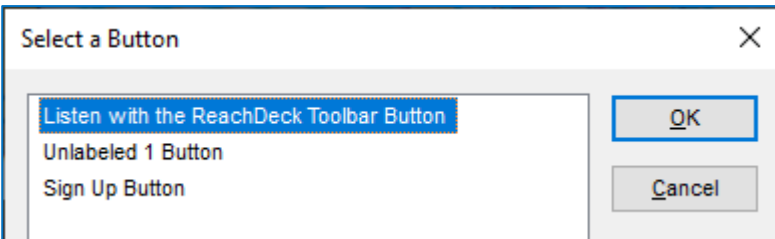
On the homepage, and throughout the site, a keyboard only user is unable to expand the main navigation links to view their content.



A keyboard only user is also unable to access the arrows that control the slides or the interactive map that is present on the page.

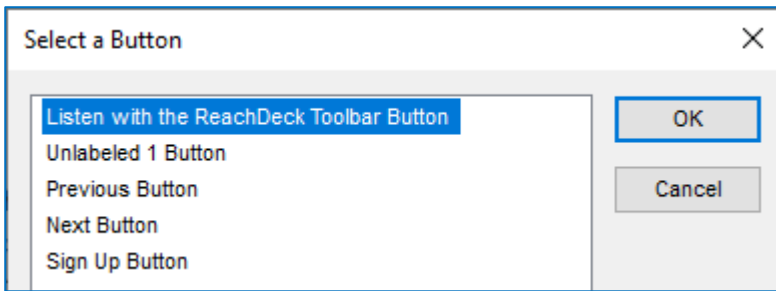


Furthermore, on the homepage, there is a video that gives no options to a keyboard only user to pause or stop the video. This video and lack of controls is an issue on several pages tested.



On the 'Lambeth Together' page, there is a video that gives no options to a keyboard only user to pause or stop the video.





Occurrences

This issue occurs throughout the site.

Example Occurrences

<https://selondonics.wpengine.com/>

<https://selondonics.wpengine.com/who-we-are/what-is-an-ics/>

<https://selondonics.wpengine.com/who-we-are/sustainability/>

<https://selondonics.wpengine.com/in-your-area/lambeth/>

<https://selondonics.wpengine.com/residents-given-the-opportunity-to-find-out-more-about-the-creation-of-a-new-statutory-integrated-care-system/>

Action Required

1. Ensure that all elements on a page are accessible to keyboard only users.
2. Ensure that any onkeypress event handlers have a corresponding onkeydown or onkeyup event handler.
3. Ensure that any onmouseover event handlers have a corresponding onfocus event handler

WCAG References

2.1.1 Keyboard: All functionality of the content is operable through a keyboard interface without requiring specific timings for individual keystrokes, except where the underlying function requires input that depends on the path of the user's movement and not just the endpoints. (Level A)

Note 1: This exception relates to the underlying function, not the input technique. For example, if using handwriting to enter text, the input technique (handwriting) requires path-dependent input but the underlying function (text input) does not.

Note 2: This does not forbid and should not discourage providing mouse input or other input methods in addition to keyboard operation.

1.4.13 Content on Hover or Focus: Where receiving and then removing pointer hover or keyboard focus triggers additional content to become visible and then hidden, the following are true (Level AA):

- **Dismissible:** A mechanism is available to dismiss the additional content without moving pointer hover or keyboard focus, unless the additional content communicates an input error or does not obscure or replace other content;
- **Hoverable:** If pointer hover can trigger the additional content, then the pointer can be moved over the additional content without the additional content disappearing;
- **Persistent:** The additional content remains visible until the hover or focus trigger is removed, the user dismisses it, or its information is no longer valid.

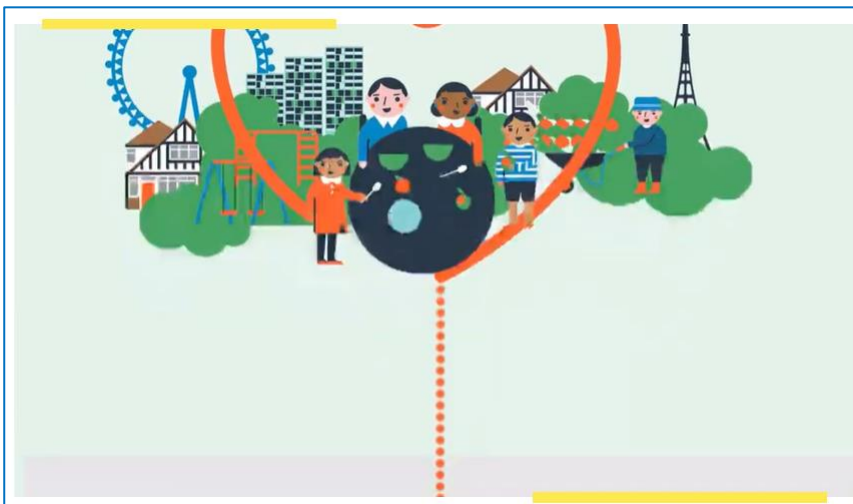
STAS-F11: Video and Audio missing Text Alternatives

Description

The website contained embedded videos on a number of pages. To enable users who have hearing impairments understand content in videos, they must have a text alternative. Transcripts and subtitles can be used to convey the information within the video to hearing impaired users.

The videos used throughout the website failed to provide a text alternative. The videos are not accompanied with a link to download or view a transcript or the ability to enable captions.

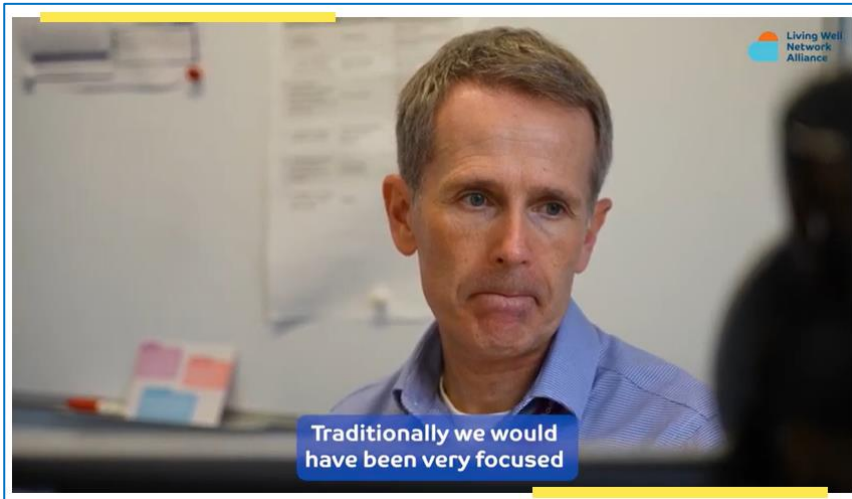
The homepage contains a video with no captions and no transcript. This video is present on several pages throughout the site.



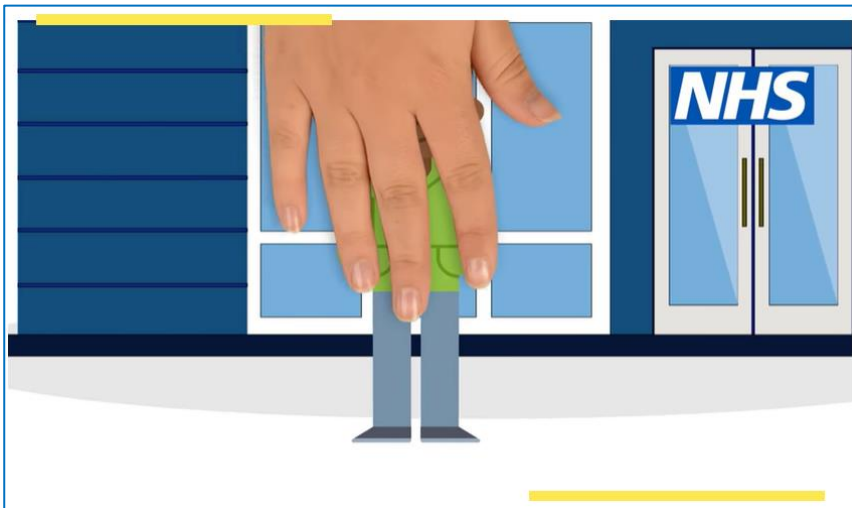
The 'Residents given the opportunity to find out more about the creation of a new statutory integrated care system' page contains a video with no captions and no transcript.



The 'Lambeth Living Well Network Alliance celebrated at the HSJ Awards' page contains a video with no transcript.



The 'Primary Care Networks' page contains a video with no captions and no transcript.



User Comments

"There are some videos on the site that do not have a transcript or subtitle. As I cannot hear the audio on the video I am unaware if I am missing any information."

Darren Hardman
Hard of Hearing and Deaf Assessor

Occurrences

This issue occurs throughout the site.

Example Occurrences

<https://selondonics.wpengine.com/>

<https://selondonics.wpengine.com/who-we-are/sustainability/>

<https://selondonics.wpengine.com/residents-given-the-opportunity-to-find-out-more-about-the-creation-of-a-new-statutory-integrated-care-system/>

<https://selondonics.wpengine.com/lambeth-living-well-network-alliance-celebrated-at-the-hsj-awards/>

<https://selondonics.wpengine.com/who-we-are/partners/pcn/>

Action Required

1. Ensure that all audio and video content has a text alternative (transcript and captions)

WCAG References

1.1.1 Non-text Content: All non-text content that is presented to the user has a text alternative that serves the equivalent purpose, except for the situations listed below. (Level A)

- **Time-Based Media:** If non-text content is time-based media, then text alternatives at least provide descriptive identification of the non-text content. (Refer to *Guideline 1.2* for additional requirements for media.)

1.2.1 Audio-only and Video-only (Prerecorded): For prerecorded audio-only and prerecorded video-only media, the following are true, except when the audio or video is a media alternative for text and is clearly labeled as such: (Level A)

- **Prerecorded Audio-only:** An alternative for time-based media is provided that presents equivalent information for prerecorded audio-only content.
- **Prerecorded Video-only:** Either an alternative for time-based media or an audio track is provided that presents equivalent information for prerecorded video-only content.

1.2.2 Captions (Prerecorded): Captions are provided for all prerecorded audio content in synchronized media, except when the media is a media alternative for text and is clearly labeled as such. (Level A)

1.2.3 Audio Description or Media Alternative (Prerecorded): An alternative for time-based media or audio description of the prerecorded video content is provided for synchronized media, except when the media is a media alternative for text and is clearly labeled as such. (Level A)

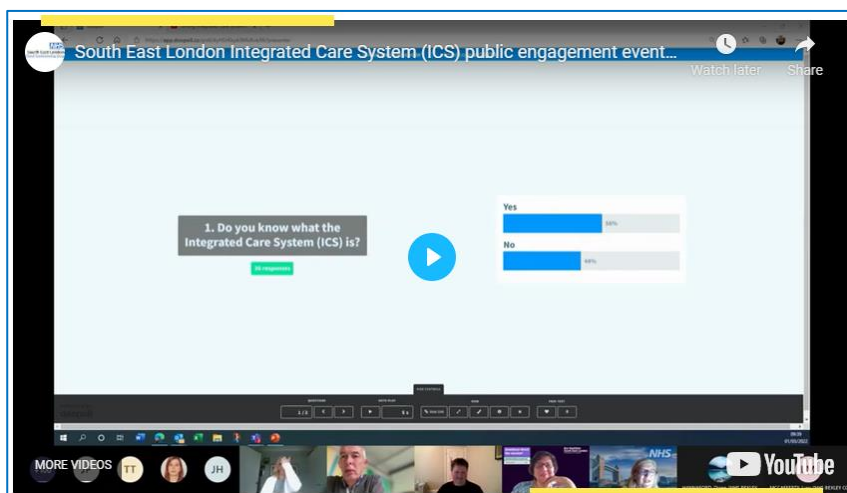
STAS-F12: Video missing Audio Description

Description

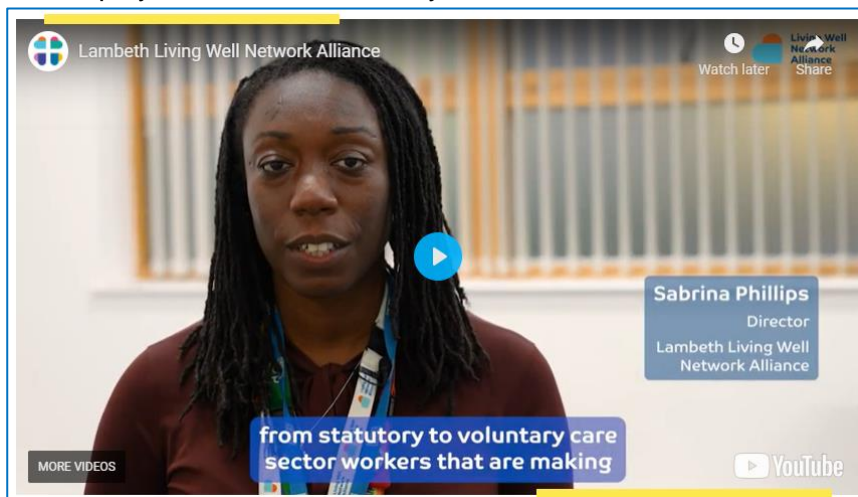
The website contained embedded videos on a number of pages. To enable users who have limited or no sight understand content in videos that have no sound, they should have an audio description to explain any quiet parts.

The videos used throughout the website provided visual material that was not explained in the audio track, was not explained in an additional audio description track and would therefore be unavailable to users who have limited or no sight.

The 'Residents given the opportunity to find out more about the creation of a new statutory integrated care system' page contains a video that displayed information visually that is unavailable to blind or low vision users.



The 'Lambeth Living Well Network Alliance celebrated at the HSJ Awards' page contains a video that displayed information visually that is unavailable to blind or low vision users.



User Comments

"There are some videos on the site where there is no sound present. As there is no audio on the video I am unaware if I am missing any information."

Alan Sleat
Screen Reader Assessor

Example Occurrences

<https://selondonics.wpengine.com/residents-given-the-opportunity-to-find-out-more-about-the-creation-of-a-new-statutory-integrated-care-system/>
<https://selondonics.wpengine.com/lambeth-living-well-network-alliance-celebrated-at-the-hsj-awards/>

Action Required

1. Ensure that all audio and video content is presented to blind and low vision users
2. Ensure that all audio and video content has audio description if required

WCAG References

1.2.3 Audio Description or Media Alternative (Prerecorded): An alternative for time-based media or audio description of the prerecorded video content is provided for synchronized media, except when the media is a media alternative for text and is clearly labeled as such. (Level A)

1.2.5 Audio Description (Prerecorded): Audio description is provided for all prerecorded video content in synchronized media. (Level AA)

STAS-F13: Missing Alt Text

Description

All images must contain a valid alternative text to allow screen readers to hear the description of the image. If an item is used for decoration, a null alt attribute should be included (alt=""), to hide the items from Screen Reading software. It will cause less confusion, while making the website more usable and accessible as a result.

Furthermore, an image with a null ALT attribute should not have a TITLE or ARIA label attributes, as it can impact on screen reader users as follows:

JAWS: Ignores all images with ALT="".

NVDA: Reads some images with ALT="" and a TITLE or ARIA label.

WindowEyes: Reads images with ALT="" and a TITLE or ARIA label.

VoiceOver Reads images with ALT="" and a TITLE or ARIA label.

There are a number of instances where images are missing alternative text.

On the homepage there are 4 images missing an alternative text attribute. These are present on multiple pages on the site.



On the 'who-we-are/partners/' page there are 8 images missing an alternative text attribute.



User Comments

"If an Image is not clearly described with an Alt Text', and only has the file number to it, then it makes it impossible for a screen reader user to know what it is depicting.

Some people may have seen before and, so, having the interaction of an image being described, brings the page alive for them.

In addition, people will not worry that they are missing vital information that is being given within the image."

Alan Sleat
Screen Reader Assessor

Example Occurrences

<https://selondonics.wpengine.com/>
<https://selondonics.wpengine.com/who-we-are/partners/>
<https://selondonics.wpengine.com/in-your-area/bromley/>
<https://selondonics.wpengine.com/news/>
<https://selondonics.wpengine.com/events/>

Action Required

1. Ensure that all images used purely for decoration purposes have a blank alternative text attribute, i.e. alt="".
2. Ensure that all non-text content used as a link to other information is given a suitable descriptive alternative text to indicate what content is being linked to.
3. Ensure that any image with a null alternative text has no title attribute

WCAG References

1.1.1 Non-text Content: All non-text content that is presented to the user has a text alternative that serves the equivalent purpose, except for the situations listed below. (Level A)

- **Controls, Input:** If non-text content is a control or accepts user input, then it has a name that describes its purpose. (Refer to *Guideline 4.1* for additional requirements for controls and content that accepts user input.)
- **Time-Based Media:** If non-text content is time-based media, then text alternatives at least provide descriptive identification of the non-text content. (Refer to *Guideline 1.2* for additional requirements for media.)
- **Test:** If non-text content is a test or exercise that would be invalid if presented in text, then text alternatives at least provide descriptive identification of the non-text content.
- **Sensory:** If non-text content is primarily intended to create a specific sensory experience, then text alternatives at least provide descriptive identification of the non-text content.
- **CAPTCHA:** If the purpose of non-text content is to confirm that content is being accessed by a person rather than a computer, then text alternatives that identify and describe the purpose of the non-text content are provided, and alternative forms of CAPTCHA using output modes for different types of sensory perception are provided to accommodate different disabilities.
- **Decoration, Formatting, Invisible:** If non-text content is pure decoration, is used only for visual formatting, or is not presented to users, then it is implemented in a way that it can be ignored by assistive technology.

1.4.5 Images of Text: If the technologies being used can achieve the visual presentation, text is used to convey information rather than images of text except for the following: (Level AA)

- **Customizable:** The image of text can be visually customized to the user's requirements;
- **Essential:** A particular presentation of text is essential to the information being conveyed.

Note: Logotypes (text that is part of a logo or brand name) are considered essential.

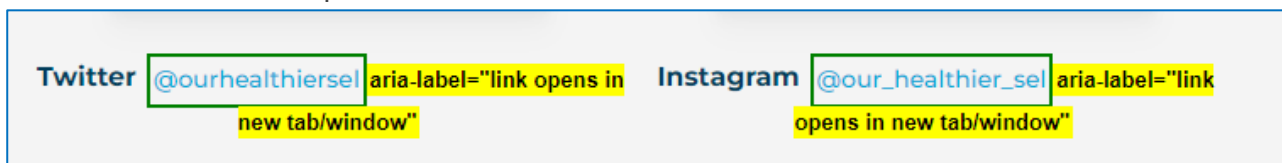
STAS-F14: Visible Label and Accessible Name Inconsistency

Description

It is important to ensure that the words which visually label a component are also the words associated with the component programmatically. This helps ensure that people with disabilities can rely on visible labels as a means to interact with the components.

Most controls are accompanied by a visible text label. Those same controls have a programmatic name, also known as the Accessible Name. Users typically have a much better experience if the words and characters in the visible label of a control match or are contained within the accessible name. When these match, speech-input users (i.e., users of speech recognition applications) can navigate by speaking the visible text labels of components, such as menus, links, and buttons that appear on the screen. Sighted users who use text-to-speech (e.g., screen readers) will also have a better experience if the text they hear matches the text they see on the screen.

On the homepage the social media element has a visual label of '@ourhealthiersel' but its coded accessible label is 'link opens in new tab/window'.



User Comments

“When being aided by a sighted colleague, I was unable to find the components that they were referring to. Upon further investigation, I found that the elements were present, they were labeled different for a screen reader user and a sighted user. This made asking for help very difficult.”

Alan Sleat
Screen Reader Assessor

Example Occurrences

<https://selondonics.wpengine.com/>

Action Required

1. Ensure that any visual text label content is replicated or contained within the programmatic/accessible name

A best practice is to have the text of the label at the start of the name.

WCAG References

1.1.1 Non-text Content: All non-text content that is presented to the user has a text alternative that serves the equivalent purpose, except for the situations listed below. (Level A)

- **Controls, Input:** If non-text content is a control or accepts user input, then it has a name that describes its purpose. (Refer to Guideline 4.1 for additional requirements for controls and content that accepts user input.)

1.3.1 Info and Relationships: Information, structure, and relationships conveyed through presentation can be programmatically determined or are available in text. (Level A)

2.5.3 Label in Name: For user interface components with labels that include text or images of text, the name contains the text that is presented visually. (Level A)

1.3.5 Identify Input Purpose: The purpose of each input field collecting information about the user can be programmatically determined when: (Level AA)

- The input field serves a purpose identified in the Input Purposes for User Interface Components section; and
- The content is implemented using technologies with support for identifying the expected meaning for form input data.

3.3.2 Labels or Instructions: Labels or instructions are provided when content requires user input. (Level A)

4.1.2 Name, Role, Value: For all user interface components (including but not limited to: form elements, links and components generated by scripts), the name and role can be programmatically determined; states, properties, and values that can be set by the user can be programmatically set; and notification of changes to these items is available to user agents, including assistive technologies. (Level A)

Note: This success criterion is primarily for Web authors who develop or script their own user interface components. For example, standard HTML controls already meet this success criterion when used according to specification.

Further Information

The `aria-label` and `aria-labelledby` properties have the highest precedence when browsers calculate accessible names. Be aware that it overrides other methods of naming the element, including the element's contents.

```
<button aria-label="Blue" aria-labelledby="color">Red</button>  
<span id="color">Yellow</span>
```

In this example, that accessible name is "Yellow".

STAS-F15: Non-Descriptive Page Titles

Description

A descriptive title helps users understand a page's purpose or content. Without a proper title, many users (especially those using screen readers or other assistive technology) may have difficulty orienting themselves to the page.

There were a number of instances where the page title was not unique to the content and failed to provide a clear description.

Page Title	Occurrences
' Lambeth Together Strategic Board - South East London ICS'	5
' Name Surname - South East London ICS'	2
' Beth's story - South East London ICS'	2

User Comments

“There are pages on the website that do not contain unique page titles. Some of the pages tested, had different content but the same page titles. This can be confusing for some users, especially screen reader users.”

Alan Sleat
Screen Reader Assessor

Occurrences

This issue occurs throughout the site.

Example Occurrences

' Lambeth Together Strategic Board - South East London ICS' is used on 5 pages:

<https://selondonics.wpengine.com/events/lambeth-together-strategic-board-5/>

<https://selondonics.wpengine.com/lambeth-together-strategic-board/>

<https://selondonics.wpengine.com/lambeth-together-strategic-board-2/>

<https://selondonics.wpengine.com/lambeth-together-strategic-board-4/>

<https://selondonics.wpengine.com/lambeth-together-strategic-board-6/>

' Beth's story - South East London ICS' is used on 2 pages:

<https://selondonics.wpengine.com/stories/beths-story/>

<https://selondonics.wpengine.com/stories/beths-story-2/>

' Name Surname - South East London ICS' is used on 2 pages:

<https://selondonics.wpengine.com/our-team/name-surname-2/>

<https://selondonics.wpengine.com/our-team/name-surname/>

Action Required

1. Ensure the all pages have a unique, descriptive and meaningful page title.

WCAG References

2.4.2 Page Titled: Web pages have titles that describe topic or purpose. (Level A)

STAS-F16: Duplicate ID's

Description

Duplicate ID errors are known to cause problems for assistive technologies when they are trying to interact with content. Duplicate values of type ID can be problematic for screen reader users that rely on this attribute to accurately convey relationships between different parts of content to users.

For example, a screen reader may use ID values to identify the applicable header content for a data cell within a data table, or an input control to which a given label applies. If these values are not unique, the screen reader will be unable to programmatically determine which headers are associated with the data cell or which control is associated with which label or name.

The following example issues have been found that may cause issues for assistive technology.

Page checked	https://selondonics.wpengine.com/
41 duplicate ids (first 10 listed)	<ol style="list-style-type: none">1. #Page-12. #flockler-embed-icon--album3. #flockler-embed-icon--angle-up4. #flockler-embed-icon--arrow-circle-left5. #flockler-embed-icon--arrow-circle-right6. #flockler-embed-icon--arrow-right7. #flockler-embed-icon--bag8. #flockler-embed-icon--calendar9. #flockler-embed-icon--cart10. #flockler-embed-icon--clock

Page checked	https://selondonics.wpengine.com/our-residents/stories/
3 duplicate ids	<ol style="list-style-type: none">1. #page2. #s3. #searchform

Page checked	https://selondonics.wpengine.com/in-your-area/southwark/
2 duplicate id	<ol style="list-style-type: none">1. #s2. #searchform

Example Occurrences

<https://selondonics.wpengine.com/>

<https://selondonics.wpengine.com/our-residents/stories/>

<https://selondonics.wpengine.com/in-your-area/southwark/>

<https://selondonics.wpengine.com/news/>

<https://selondonics.wpengine.com/events/>

Action Required

1. Ensure that all values of type ID are unique in the Web page

WCAG References

4.1.1 Parsing: In content implemented using markup languages, elements have complete start and end tags, elements are nested according to their specifications, elements do not contain duplicate attributes, and any IDs are unique, except where the specifications allow these features. (Level A)

Note: Start and end tags that are missing a critical character in their formation, such as a closing angle bracket or a mismatched attribute value quotation mark are not complete.

STAS-F17: HTML Markup Errors

Description

Valid HTML code ensures that a site is understood by a browser in the way the designer intended. Valid sites are more likely to be future proof, more likely to look good on a range of browsers and devices, should improve SEO rankings and are more likely to be compatible with assistive technology. Errors in HTML are easy to make but very hard to find and fix without a tool like a HTML validator. To ensure compatibility with browsers and assistive technology, each page should pass a HTML validator with no errors.

Some pages throughout the site have markup errors and parsing errors that may impact on assistive technologies and may cause screen readers to miss content. Markup errors like missing end tags mean screen readers may skip important content.

Note: This is an automated test carried out by the [W3C Markup Validation Service](#), however any HTML validator should produce the same results.

Page checked	Errors	Warnings
https://selondonics.wpengine.com/	6	25
https://selondonics.wpengine.com/senior-leadership/name-surname-3/	6	21
https://selondonics.wpengine.com/in-your-area/lambeth/	6	21
https://selondonics.wpengine.com/in-your-area/southwark/	6	20
https://selondonics.wpengine.com/who-we-are/working-for-us/	5	20

Example Occurrences

<https://selondonics.wpengine.com/>

<https://selondonics.wpengine.com/our-team/name-surname-3/>

<https://selondonics.wpengine.com/in-your-area/lambeth/>

<https://selondonics.wpengine.com/in-your-area/southwark/>

<https://selondonics.wpengine.com/who-we-are/working-for-us/>

Action Required

1. Ensure that no HTML parsing errors exist and that can impact use of assistive technologies.

WCAG References

4.1.1 Parsing: In content implemented using markup languages, elements have complete start and end tags, elements are nested according to their specifications, elements do not contain duplicate attributes, and any IDs are unique, except where the specifications allow these features. (Level A)

Note: Start and end tags that are missing a critical character in their formation, such as a closing angle bracket or a mismatched attribute value quotation mark are not complete.

4.1.2 Name, Role, Value: For all user interface components (including but not limited to: form elements, links and components generated by scripts), the name and role can be programmatically determined; states, properties, and values that can be set by the user can be programmatically set; and notification of changes to these items is available to user agents, including assistive technologies. (Level A)

Note: This success criterion is primarily for Web authors who develop or script their own user interface components. For example, standard HTML controls already meet this success criterion when used according to specification.

STAS-F18: Inaccessible Non-HTML Documents

Description

A number of non-HTML documents, such as Adobe Acrobat (PDF) files, were encountered. In order for users to access the content contained within non-HTML documents, these documents should be accessible or have an accessible alternative.

The PDF documents examined had issues that prevented certain users from being able to access the content. A number of PDFs did not contain a headings structure, making it difficult for screen reader users to understand and navigate the structure of the document. (Please note that this is an automated test)

A scan of the 'ICS-engagement-event-010322.pdf' document produced the following results:

29 checks performed / 25 checks passed (86%) / 4 checks failed

Document (1 issues)	Alternate Text (2 issues)
✓ Accessibility permission flag	✗ Figures alternate text
✓ Image-only PDF	✓ Nested alternate text
✓ Tagged PDF	✓ Associated with content
✓ Primary language	✓ Hides annotation
✓ Title	✗ Other elements alternate text
✗ Bookmarks	
Page Content (0 issues)	Forms (0 issues)
✓ Tagged content	✓ Tagged form fields
✓ Tagged annotations	✓ Field descriptions
✓ Tab order	Tables (1 issues)
✓ Character encoding	✓ Rows
✓ Tagged multimedia	✓ TH and TD
✓ Screen flicker	✓ Headers
✓ Scripts	✗ Regularity
✓ Timed responses	Lists (0 issues)
✓ Navigation links	✓ List items
✓ Appropriate heading nesting	✓ Lbl and LBody

A scan of the 'ICS-engagement-event-090322.pdf' document produced the following results:

29 checks performed / 24 checks passed (82%) / 5 checks failed

Document (2 issues)

- ✓ Accessibility permission flag
- ✓ Image-only PDF
- ✓ Tagged PDF
- ✓ Primary language
- ✗ Title
- ✗ Bookmarks

Alternate Text (2 issues)

- ✗ Figures alternate text
- ✓ Nested alternate text
- ✓ Associated with content
- ✓ Hides annotation
- ✗ Other elements alternate text

Page Content (0 issues)

- ✓ Tagged content
- ✓ Tagged annotations
- ✓ Tab order
- ✓ Character encoding
- ✓ Tagged multimedia
- ✓ Screen flicker
- ✓ Scripts
- ✓ Timed responses
- ✓ Navigation links
- ✓ Appropriate heading nesting

Forms (0 issues)

- ✓ Tagged form fields
- ✓ Field descriptions

Tables (1 issues)

- ✓ Rows
- ✓ TH and TD
- ✓ Headers
- ✗ Regularity

Lists (0 issues)

- ✓ List items
- ✓ Lbl and LBody

User Comments

“When viewing several PDF documents, I found no evidence of a headings structure, and some graphics did not contain a clear label I am also unsure if some graphics are used for decoration or to convey specific information I also noticed a table that did not contain a clear header, and some of the columns and rows were not clearly labelled for screen reader users

All documents should contain a clear and logical headings structure, and all elements that are used to convey information such as tables, graphics, and links should be tagged to provide easier and accessible navigation, this will promote a positive user experience as a result.”

Alan Sleat
Screen Reader Assessor

Example Occurrences

<https://www.ourhealthiersel.nhs.uk/Downloads/News/ICS-engagement-event-010322.pdf>

<https://www.ourhealthiersel.nhs.uk/Downloads/News/ICS-engagement-event-090322.pdf>

Action Required

1. Ensure all non-HTML documents are accessible.
2. Provide accessible alternatives to inaccessible non-HTML documents where applicable.

Note: The Shaw Trust Accessibility Services recognises that it may be impractical to make all non-HTML documents accessible due to volume and complexity. In this scenario, only proof of policy to make all future non-HTML documents accessible is required for conformance.

WCAG References

1.1.1 Non-text Content: All non-text content that is presented to the user has a text alternative that serves the equivalent purpose, except for the situations listed below. (Level A)

1.3.1 Info and Relationships: Information, structure, and relationships conveyed through presentation can be programmatically determined or are available in text. (Level A)

2.4.2 Page Titled: Web pages have titles that describe topic or purpose. (Level A)

Priority AA Issues

STAS-F19: Insufficient Colour Contrast

Description

The combination of text and background colour should be set to create an easy to read website. Using colours that are similar for the background and foreground can cause blocks of text to become difficult to read. Alternative stylesheets can be used to change the appearance of the page and provide an alternative with a stronger contrast.

The minimum colour contrast ratio between the foreground and background should be at least 4.5:1. For large text, the ratio can be lowered to 3:1.

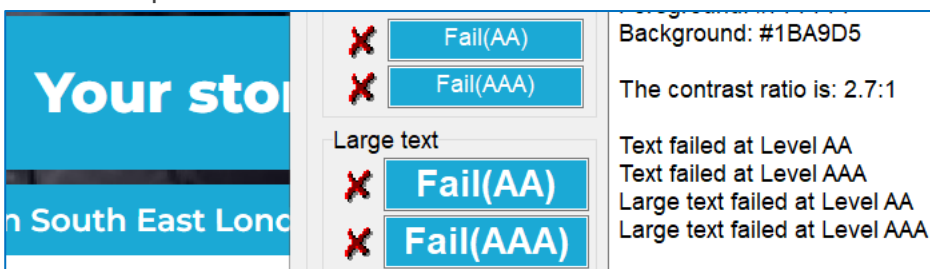
Text is considered large if it is

- greater than 18 point (approx. 24px) or
- greater than 14 point (approx. 18.6px) if bolded (font-weight:700 or more).

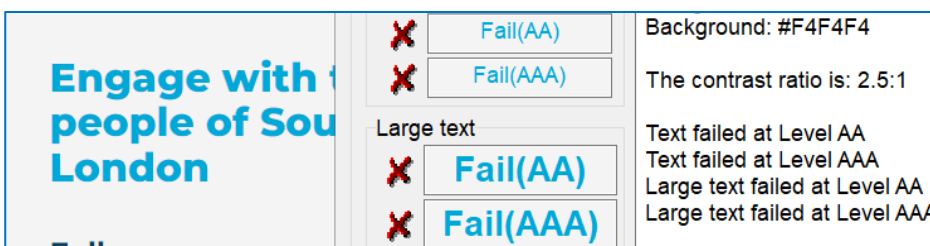
For interactive elements, the contrast between the element and the background should be 3:1.

Throughout the site there are combinations of colours that fall below the minimum contrast levels that make the text difficult to read.

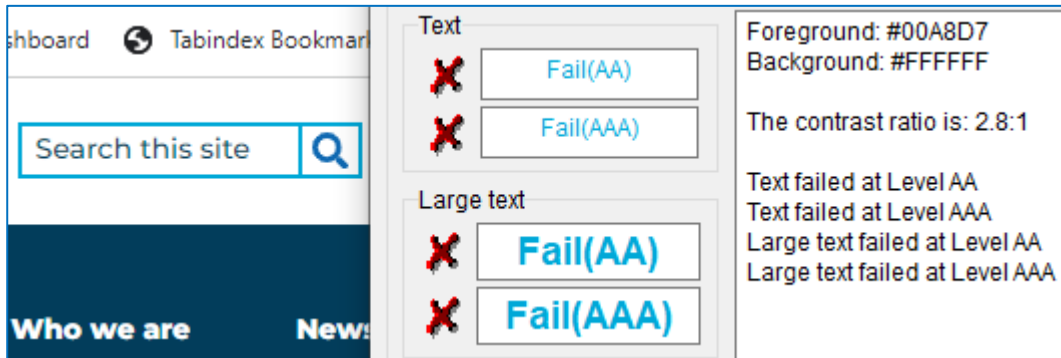
The white text on a light blue background on the homepage, and throughout the site fails colour contrast requirements with a ratio of 2.7.



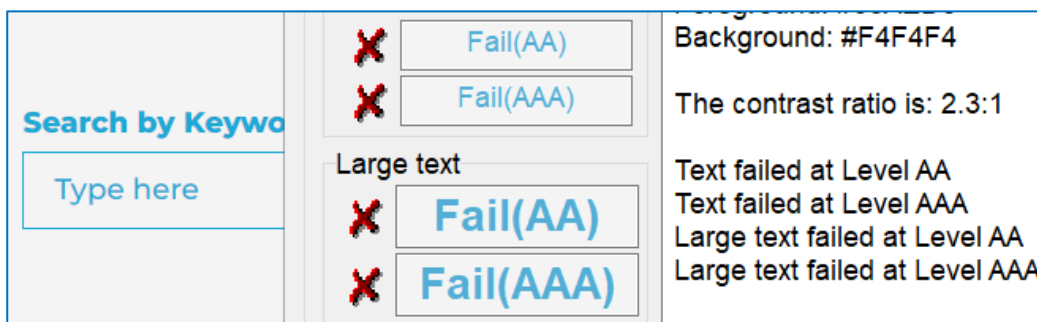
The light blue text on a light grey background on the homepage fails colour contrast requirements with a ratio of 2.5.



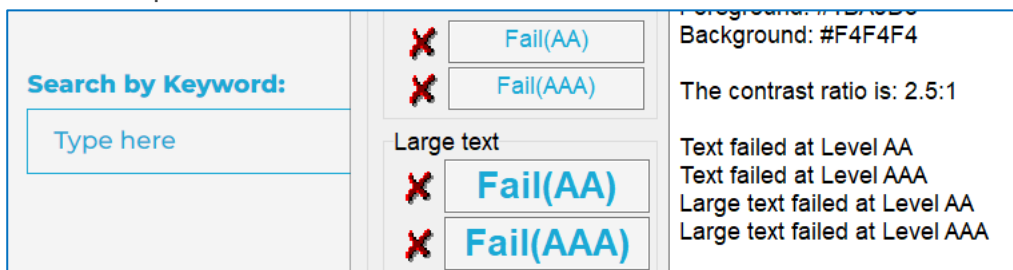
The light blue border of the 'Search' form field on a light grey background on the homepage, and throughout the site fails colour contrast requirements with a ratio of 2.8.



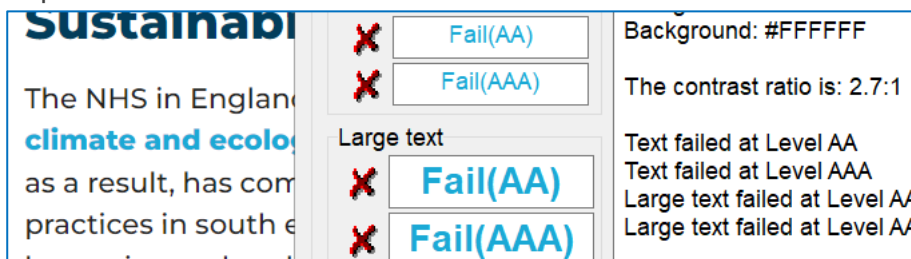
On the 'News' page the light blue text on a light grey background fails colour contrast requirements with a ratio of 2.3.



The light blue border of the form fields on the light grey background on the 'News' page fails colour contrast requirements with a ratio of 2.5.



The light blue text of the link on the 'Bexley Local Care Partnership' page fails colour contrast requirements with a ratio of 2.7.



User Comments

“There are a number of instances where the text is made harder to read because of the colour combination used. Changing either the foreground colour or background colour to make the combination stronger would help low vision and colour blind people read the content.”

Sam Hopkins
Readability Assessor

Occurrences

This issue occurs throughout the site.

Example Occurrences

<https://selondonics.wpengine.com/>

<https://selondonics.wpengine.com/news/>

<https://selondonics.wpengine.com/who-we-are/sustainability/>

<https://selondonics.wpengine.com/get-involved/>

<https://selondonics.wpengine.com/in-your-area/bexley/>

Action Required

1. Ensure that all colour combinations meet the minimum ratio.
2. Ensure that all foreground and background colours have been specified.
3. Ensure that styling is used to increase the contrast of any browser defaults, especially for text boxes and other form inputs.

WCAG References

1.4.3 Contrast (Minimum): The visual presentation of text and images of text has a contrast ratio of at least 4.5:1, except for the following: (Level AA)

- Large Text: Large-scale text and images of large-scale text have a contrast ratio of at least 3:1;
- Incidental: Text or images of text that are part of an inactive user interface component, that are pure decoration, that are not visible to anyone, or that are part of a picture that contains significant other visual content, have no contrast requirement.
- Logotypes: Text that is part of a logo or brand name has no minimum contrast requirement.

1.4.11 Non-text Contrast: The visual presentation of the following have a contrast ratio of at least 3:1 against adjacent color(s): (Level AA)

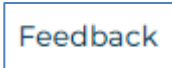
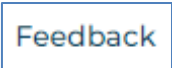

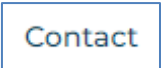
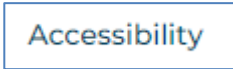
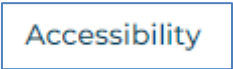


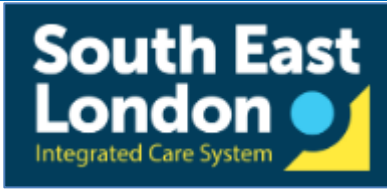


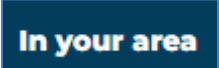







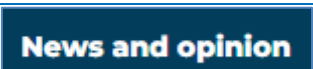
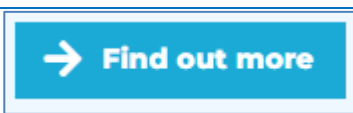
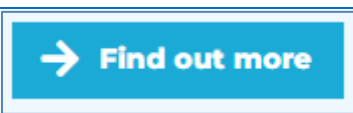
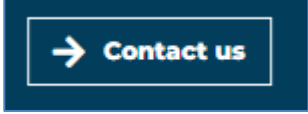
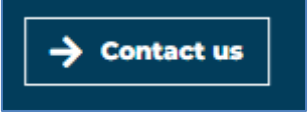
- User Interface Components: Visual information required to identify user interface components and states, except for inactive components or where the appearance of the component is determined by the user agent and not modified by the author;
- Graphical Objects: Parts of graphics required to understand the content, except when a particular presentation of graphics is essential to the information being conveyed.

STAS-F20: Elements not Visible in Focus

Description

Users who are reliant on a keyboard to navigate the website use the tab key to cycle through the links on a page. A visual cue is required to highlight which link is currently in focus so that the user can identify where they are within the set of links on a page. Not having link highlighting can make it more difficult and confusing for keyboard only users to navigate a site.

Throughout the site, the majority of links in focus were not highlighted to the users. The lack of link highlighting also makes it difficult for keyboard operability to be fully assessed.

Element not in focus	Element in focus
	
	
	
	
	
	
	
	
	
	
	
	

In contrast, there is some good link highlighting on the 'Bexley Local Care Partnership' page

Link not in focus	Link in focus
	
	
	
	

User Comments

“Highlighting for keyboard only is not that good on parts of the site, where not every link I Tab onto has some form of highlighting focus; whether it is a distinct colour change, background change, or a caret (Dashed Box).”

Kevin James
Keyboard Only Assessor

Occurrences

This issue occurs throughout the site.

Example Occurrences

- <https://selondonics.wpengine.com/>
- <https://selondonics.wpengine.com/in-your-area/>
- <https://selondonics.wpengine.com/residents-given-the-opportunity-to-find-out-more-about-the-creation-of-a-new-statutory-integrated-care-system/>
- <https://selondonics.wpengine.com/who-we-are/>
- <https://selondonics.wpengine.com/news/>

Action Required

1. Provide a strong visual cue on focus for elements that can receive keyboard focus.

WCAG References

2.4.7 Focus Visible: Any keyboard operable user interface has a mode of operation where the keyboard focus indicator is visible. (Level AA)

Further Information

Implementing a strong focus highlighting mechanism is important to improving keyboard navigation.

There is no prescribed way to achieve a good focus highlighting, so branding and identity can be maintained.

Good examples can be seen on www.accessibility-services.co.uk and www.gov.uk

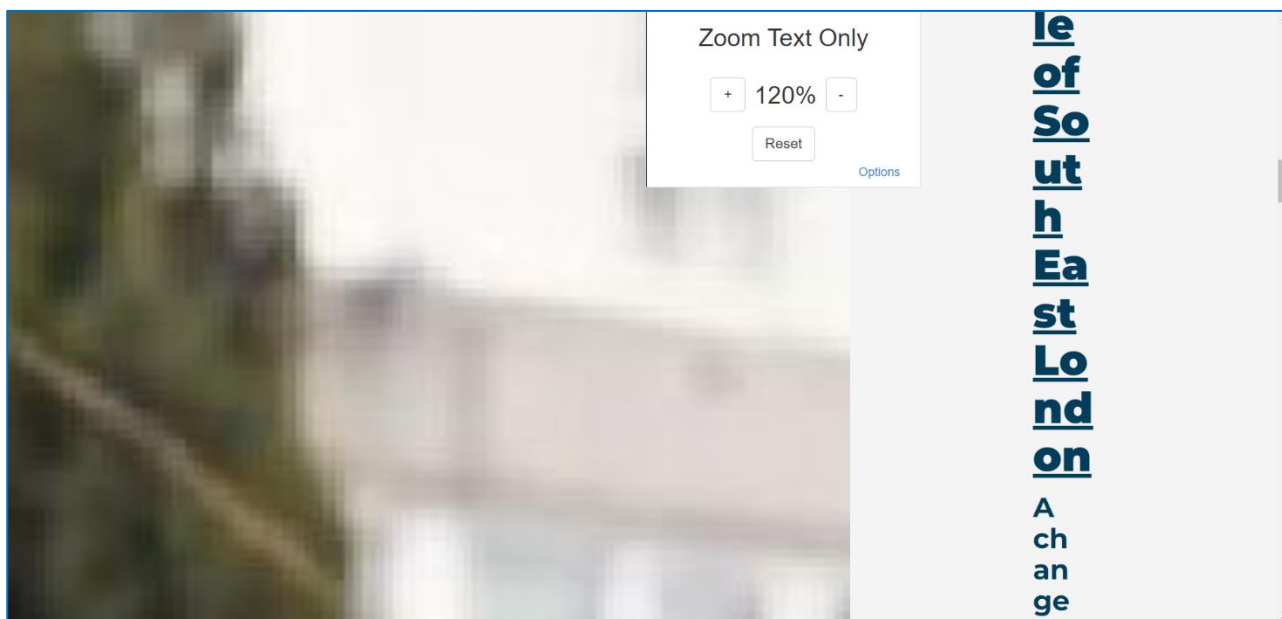
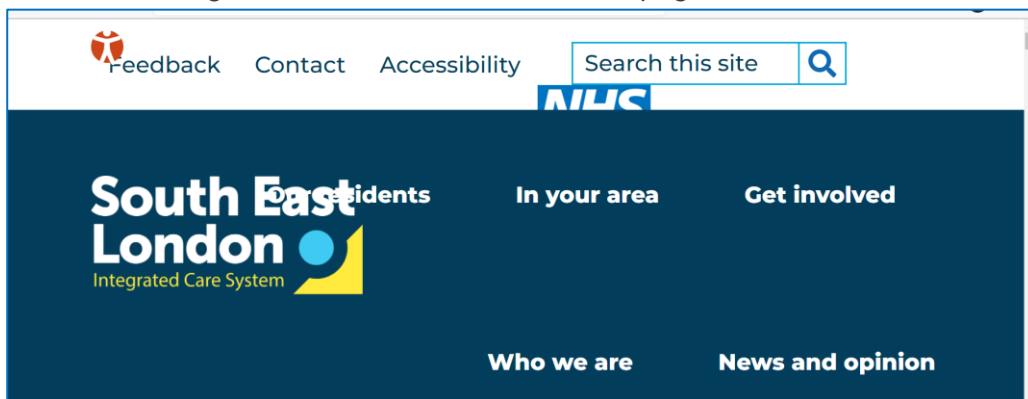
The screenshot shows a navigation menu with four items: Home, About Us, Meet The Team, and Services. The 'Meet The Team' item is highlighted with a blue border. Below the menu, there are four content blocks arranged in a 2x2 grid. The top-left block is titled 'Benefits' and includes the text 'Includes eligibility, appeals, tax credits and Universal Credit'. The top-right block is titled 'Disabled people' and includes the text 'Includes carers, your rights, benefits and the Equality Act'. The bottom-left block is titled 'Births, deaths, marriages and care' and includes the text 'Parenting, civil partnerships, divorce and Lasting Power of Attorney'. The bottom-right block is titled 'Driving and transport' and includes the text 'Includes vehicle tax, MOT and driving licences'. The 'Births, deaths, marriages and care' block is highlighted with a yellow background.

STAS-F21: Obscured Text

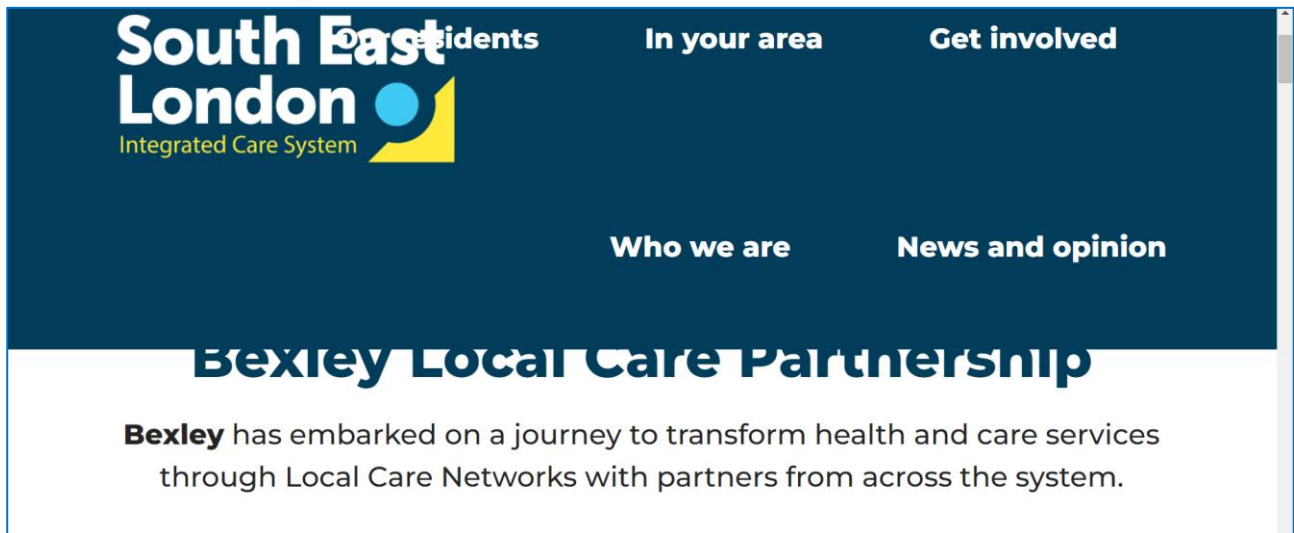
Description

Some users will need to view the text on a page or the page itself in different ways. One of the most common ways is through text resizing or page magnification.

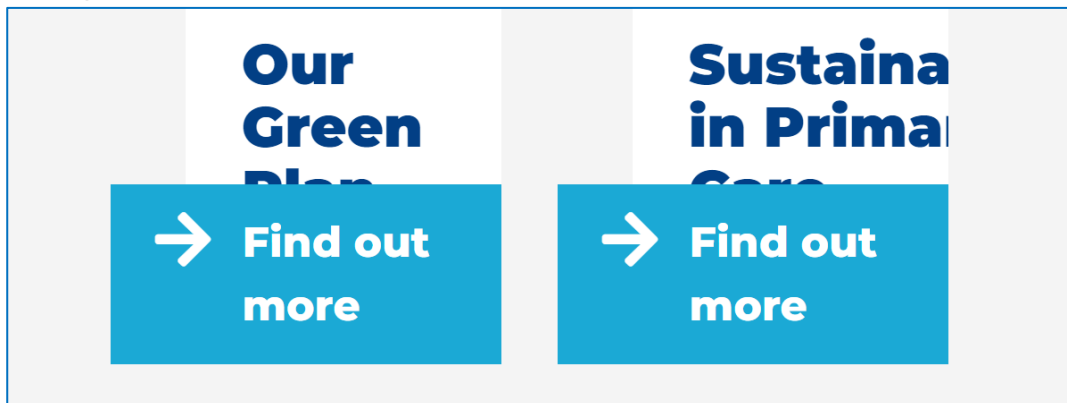
When increasing the size of the text on the homepage, the content starts to overlap.



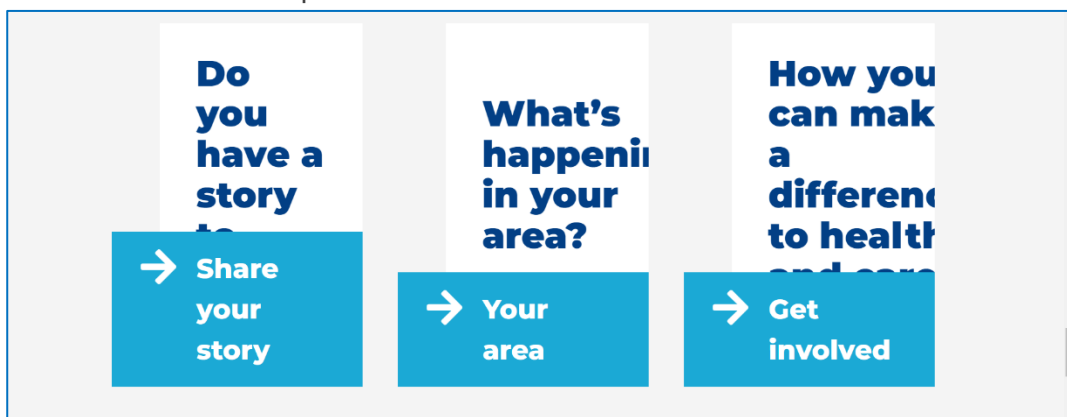
When increasing the size of the text on the 'Bexley Local Care Partnership' page, some of the content starts to overlap.



When increasing the size of the text on the 'Sustainability' page, some of the content starts to overlap.



When increasing the size of the text on the 'Minister for Children and Families' page, some of the content starts to overlap.



When increasing the size of the text on the 'In Your Area' page, some of the content starts to overlap.



Occurrences

This issue occurs throughout the site.

Example Occurrences

<https://selondonics.wpengine.com/>

<https://selondonics.wpengine.com/in-your-area/bexley/>

<https://selondonics.wpengine.com/who-we-are/sustainability/>

<https://selondonics.wpengine.com/minister-for-children-and-families-and-national-youth-mental-health-ambassador-visit-belvedere-secondary-school-during-childrens-mental-health-week/>

<https://selondonics.wpengine.com/in-your-area/>

Action Required

1. Ensure that when text is resized to 200% there is no loss of content.

WCAG References

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

Advisories

STAS-A01: Links to Non-HTML Documents

Description

Links to non-HTML documents often omit their file type and file size in a way that can be determined by assistive technologies. Sometimes an image of the file type and textual file size is included on the page, but is not part of the link; this will therefore not be picked up by assistive technology as easily as if it were part of the link itself

Links to non-HTML documents should open in a new window or a new tab. This is because certain file types may open in a browser plugin by default, which can cause issues for assistive technology users. Users may find that they cannot navigate back to the previous page, making navigation difficult. Opening documents in a new window/tab enables these users to close the window with the open file and return to their previous location.

On the 'Residents given the opportunity to find out more about the creation of a new statutory integrated care system' page there are links to PDFs that do not contain the file type and size information.

If you were unable to attend, recordings of both sessions on **1 March** and **9 March 2022** are now available on our YouTube Channel. You can also view the slides both sessions on **1 March** and **9 March**, which includes the a



On the 'Bexley Local Care Partnership' page, there is a link to a PDF that does not contain the file type and size information.

The NHS in England has recognised that the **climate and ecological emergency is a health emergency** and



as a result, has committed to reach net-zero by 2040. GP practices in south east London are already taking action by becoming carbon literate, assessing their carbon footprint, greening their estates, and implementing green practice action plans.

User Comments

“When a Non HTML document has no indication alongside the link of its format, it is very problematic for a Screen Reader User. Furthermore, whether they have the software to read such a document. Therefore, the link that opens a non-HTML document should have information of the format and size alongside the link. The inclusion of this information will allow people the full knowledge of what format the document is in, and whether they have the software to read such a format; or whether there may be an issue in reading it within that format.

In addition, the information about the size of the document may determine the time it may take to upload, or the memory they have on their device.

Clear information on links of this kind will assist everyone using the site, and encourage them to open the information.”

Alan Sleat

Screen Reader Assessor

Example Occurrences

<https://selondonics.wpengine.com/residents-given-the-opportunity-to-find-out-more-about-the-creation-of-a-new-statutory-integrated-care-system/>

<https://selondonics.wpengine.com/who-we-are/sustainability/>

Recommendation

1. Ensure links to non-HTML documents include file type and file size within the link text. For example [Annual Report \(PDF, 87kb\)](#)

Shaw Trust is a charity which was founded in the village of Shaw, Wiltshire in 1982.

Our Vision:

Shaw Trust believes that everyone has the right to employment, inclusion and independence.

Our Purpose is to:

Focus on people who experience barriers related to disability, health and other disadvantages, providing personalised support to enable them to work, gain independence and control and contribute to family and community life.

Influence policy and improve the lives of disabled and disadvantaged people.

By working with businesses, commissioners and partner organisations, we've helped over 450,000 people achieve employment, inclusion and independence.

If you would like to know more about Shaw Trust please contact us today.
Call: 01225 716300
Email: info@shaw-trust.org.uk
Web: www.shaw-trust.org.uk

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Registered Charity Number in England & Wales 287785
Registered Charity Number in Scotland SC039856

