# Voluntary Product Accessibility Template® (VPAT®) WCAG Edition

#### Version 2.4Rev

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#### **About This Document**

The VPAT is provided in four editions based on the standards/guidelines being evaluated. The editions are WCAG, Revised 508, EN 301 549 and International, which includes all of the standards.

This is the WCAG edition of the VPAT. It includes the following standards/guidelines:

- Web Content Accessibility Guidelines 2.0
- Web Content Accessibility Guidelines 2.1

If you need to report on a different combination of standards/guidelines, use the appropriate alternate edition of the VPAT found on ITI Accessibility web page.

This document is broken into two main sections:

- Essential Requirements and Best Practices for using the VPAT® to complete an Accessibility Conformance Report (the instructions)
- The VPAT

Please carefully review the Essential Requirements and Best Practices sections before using the VPAT to create an Accessibility Conformance Report.

The purpose of these instructions is to promote accurate and consistent reporting of product accessibility information.

The VPAT is a template used to document a product's conformance with accessibility standards and guidelines. The purpose of the Accessibility Conformance Report is to assist customers and buyers in making preliminary assessments regarding the availability of commercial "Electronic and Information Technology," also referred to as "Information and Communication Technology" (ICT) products and services with features that support accessibility.

The Information Technology Industry Council (ITI) provides the VPAT. Use of the template and service mark does not require membership in ITI.

# Essential Requirements and Best Practices for Information & Communications Technology (ICT) Vendors

This section provides guidance for reporting product conformance for major accessibility standards and guidelines using the VPAT® to produce the Accessibility Conformance Report. Deviating from these guidelines precludes vendors from referencing the template by name and/or the VPAT acronym.

### **Getting Started**

- 1. Before creating a report, read all of the materials provided in this document.
- 2. Determine which accessibility standards/guidelines will be included in the product conformance report and use the appropriate VPAT file.
- 3. It is the vendor's responsibility to maintain the integrity of the data in the report.

#### **Essential Requirements for Authors**

The following are the minimum requirements to produce an Accessibility Conformance Report based on the VPAT<sup>®</sup>.

- 1. The VPAT name and template are registered service marks of ITI. Use of the VPAT template and name requires the inclusion of the registered service mark (i.e., "VPAT®"). Users of the VPAT agree not to deviate from the Essential Requirements for Authors.
- 2. The template file can be used as is or replicated in a different delivery format, for example as HTML or PDF. The final conformance report must be accessible.
- 3. A report must contain the following content at a minimum:
  - Report Title In the heading format of "[Company Name] Accessibility Conformance Report"
  - VPAT Heading Information Template version
  - Name of Product/Version Name of Product being reported, including product version identifier if necessary

- **Report Date** Date of report publication. At a minimum, provide the month and year of the report publication. For example, "May 2016". If date is included, ensure it is clear "4 May 2016" or "May 4, 2016".
- **Product Description** A brief description of the product
- Contact Information Contact Information for follow-up questions. Listing an email is sufficient.
- Notes Any details or further explanation about the product or the report.
   This section may be left blank.
- **Evaluation Methods Used** Include a description of evaluation methods used to complete the VPAT for the product under test.
- **Applicable Standards/Guidelines** A clear indication of which Standards/Guidelines this Conformance Report covers.
  - The list must include only the Standards/Guidelines used to evaluate the product.
  - The applicable Standards/Guidelines that are included in this edition of the VPAT template are:
    - Web Content Accessibility Guidelines 2.0 or WCAG 2.0 (ISO/IEC 40500)
    - Web Content Accessibility Guidelines 2.1 or WCAG 2.1
  - If other Standards/Guidelines are reported then use the appropriate VPAT edition.
  - This information can be in a table format at the top of the report with the table heading 'Standards/Guidelines' and the reported Standards/Guidelines identified. This information can alternatively be supplied in the introductory text of the report. In the VPAT we have used a table as an example and listed "(yes / no)" for each guideline. To indicate what the report covers leave the appropriate yes or no on each guideline.
  - If multiple Guideline tables are included, each table must identify the Guideline that the criteria in that table represent.
- Terms The report must list the definition of the terms used in the Conformance Level column. ITI recommends the following terms. If a vendor deviates from the ITI definitions, the vendor shall reference this change in the heading Notes section. If a term is not used it can be removed from the list. The ITI definitions are:

- **Supports**: The functionality of the product has at least one method that meets the criterion without known defects or meets with equivalent facilitation.
- Partially Supports: Some functionality of the product does not meet the criterion.
- **Does Not Support**: The majority of product functionality does not meet the criterion.
- Not Applicable: The criterion is not relevant to the product.

<u>Note</u>: When filling in the WCAG tables, a response may use 'Supports' where one might otherwise be inclined to use 'Not Applicable'. This is in keeping with <u>WCAG 2.0 Understanding Conformance</u>: This means that if there is no content to which a success criterion applies, the success criterion is satisfied.

- **Not Evaluated**: The product has not been evaluated against the criterion. This can only be used in WCAG 2.x Level AAA.
- Tables for Each Standard or Guideline Tables showing the responses to the criteria.
- 5. WCAG Conformance Information The answers in the WCAG success criteria are based on the level of conformance being reported (Level A, AA or AAA).
  - These tables are used to answer:
    - The selected levels of WCAG 2.x Guidelines.
  - When reporting on WCAG 2.0 criteria it is acceptable to remove the WCAG 2.1-specific criteria from the table. These are marked '2.1 only' within the row.
- 6. Remarks and Explanations Detailed remarks should be provided in the Remarks and Explanations column to justify your answer in the Conformance Level column.
  - When the conformance level is 'Partially Supports' or 'Does Not Support', the remarks should identify:
    - 1. The functions or features with issues
    - 2. How they do not fully support
  - If the criterion does not apply, explain why.
  - If an accessible alternative is used, describe it.

#### **Best Practices for Authors**

ITI suggests that authors adopt the following best practices when using the VPAT® to create an Accessibility Conformance Report.

- Branding Header: Company logo or branding information
- Report Date Changes: If a report is revised, change the report date and
  explain the revision in the Notes section. Alternately, create a new report and
  explain in the Notes section that it supersedes an earlier version of the report.
- Notes: Add any notes applicable to product or the report
  - Additional information about the product version that the document references
  - Any revisions to the document
  - Links to any related documents
  - Additional information describing the product
  - Additional information about what the document does or does not cover
  - Information suggested by the <u>WCAG 2.0 Conformance Claim</u>
  - Information needed to satisfy ISO/IEC 17050-1:2004, Supplier's Declaration of Conformity
- Evaluation Methods Used Information to enter may include the following:
  - Testing is based on knowledge of general product functionality (Instructional note: this would mean the tester knows how to use the common uses and flows of the product in addition to accessibility)
  - Similar to another evaluated product
  - Testing with assistive technologies
  - Published test method (provide name, publisher, URL link)
  - · Vendor proprietary test method
  - Other test method
- Remarks and Explanations: This section may include:
  - Information regarding the testing of a given criteria.
  - Information on application dependencies to support accessibility (e.g. OS, app frameworks, browsers recommended).

- How the customer can find more information about accessibility issues.
   One method can be to include the bug ID where customers can call the company's customer support to get additional information.
- Known workarounds for accessibility issues.
- **Legal Disclaimer:** Area for any legal disclaimer text required by your organization.
- **Report Size:** To reduce the size of the report it is acceptable to remove sections. Individual criteria cannot be removed, only sections at a time. Section removal is acceptable in four situations:
  - When an entire section is not being reported on because it does not apply to the product, for example:
    - Chapter 4: Hardware. Information should be included in the notes for that section why it has been removed.
    - A card reader that does not have sound could remove the criteria in section 413 Closed Caption Processing Technologies and just note the why the criteria does not apply.
  - When reporting on WCAG 2.0 criteria it is acceptable to remove the WCAG 2.1-specific criteria from the table. These are marked '2.1 only' within the row.
  - If the product is not being evaluated for a level of the criteria (for example Level AAA) then that table may be deleted.
  - If a requesting customer has identified that a section of the standard does not apply, information should be included in the notes that the section has been removed.
- **WCAG 2.x Tables:** The WCAG 2.x criteria are shown in three tables, Level A, Level AA, and Level AAA.
  - If desired, these tables can be combined into one table.
  - When reporting on a level (A, AA or AAA) all criteria for that level must be answered for the particular version of WCAG that the report includes.
- Language: Translation to other languages is permitted.
- Multiple Reports: When using the VPAT to create an Accessibility
  Conformance Report for complex products it may be helpful to separate
  answers into multiple reports. For example, when a product is an Authoring
  Tool that also has web content and documentation. When multiple reports
  are used for a complex product, it is required to explain this and how to reach
  the other reports in the Notes section of each report.

- **Criteria Text:** To help conserve space in the ITI template only the criteria ID number and a short title have been included. Where possible, links have been included to the standard/guideline.
  - It is acceptable to add the full text of the criteria into the cell if desired to help with understanding.
  - The links to the standards/guidelines can be removed.
- Ordering of Tables: The order that the guideline tables appear may be changed to facilitate reading. For example, instead of separating the Level A, Level AA and Level AAA criteria, they may be put in one table in numerical order.
- Guideline Section Heading Rows in Tables: The tables include heading rows to facilitate understanding the context of the criteria.
  - The cells in these rows do not require answers as indicated by "Heading cell – no response required."
  - It is optional to add a response if desired.
  - The shading of the row is also optional.
  - If removing the heading rows, edit the criteria titles so it's clear where they apply.

### **Posting the Final Document**

- When publishing your Accessibility Conformance Report, be sure to remove the entire first 9 pages of this document, including the table of contents, introductory information and instructions.
- Check for each required item in the VPAT® document:
  - [Company Name] Accessibility Conformance Report (report title)
  - (Based on VPAT® Version 2.4Rev)
  - Name of Product/Version
  - Report Date
  - Product Description
  - Contact Information
  - Notes
  - Evaluation Methods Used
  - Applicable Standards/Guidelines

- Terms
- Tables for Each Standard or Guideline
  - Check that there is a response for each criterion for 'Conformance Level' and 'Remarks and Explanations.'
- Verify that the final document is accessible.
- Post your final document on your company's web site, or make the document available to customers upon request.

## Table Information for VPAT® Readers

For each of the standards, the criteria are listed by chapter in a table. The structures of the tables are: the first column contains the criteria being evaluated, the second column describes the level of conformance of the product regarding the criteria and the third column contains any additional remarks and explanations regarding the product.

- When sections of criteria do not apply, or are deemed by the customer as not applicable, the section is noted as such and the rest of that table may be removed for that section.
- When multiple standards are being recorded in this document, the duplicative sections are noted and responded to only one time. The duplicate entry will note the cross reference to the data.

# Open Policy Ltd Accessibility Conformance Report WCAG Edition

(Based on VPAT® Version 2.4Rev)

Name of Product/Version: Overton (version as of April 2022)

Report Date: 10<sup>th</sup> May 2022

**Product Description:** Web based database of policy documents

Contact Information: support@overton.io

Notes: We are fully compliant to WCAG 2.1 Level A. We're currently (in Q2 2022) working towards Level AA.

**Evaluation Methods Used:** We use a combination of manual inspection, in-house automated tests and Google Lighthouse.

### **Applicable Standards/Guidelines**

This report covers the degree of conformance for the following accessibility standard/guidelines:

Standard/Guideline	Included In Report
Web Content Accessibility Guidelines 2.0	Level A (Yes / <del>No</del> )
	Level AA (Yes / <del>No</del> )
	Level AAA (Yes / <del>No</del> )
Web Content Accessibility Guidelines 2.1	Level A (Yes / <del>No</del> )
	Level AA (Yes / <del>No</del> )
	Level AAA (Yes / <del>No</del> )

<sup>&</sup>quot;Voluntary Product Accessibility Template" and "VPAT" are registered service marks of the Information Technology Industry Council (ITI)

#### **Terms**

The terms used in the Conformance Level information are defined as follows:

- **Supports**: The functionality of the product has at least one method that meets the criterion without known defects or meets with equivalent facilitation.
- Partially Supports: Some functionality of the product does not meet the criterion.
- Does Not Support: The majority of product functionality does not meet the criterion.
- Not Applicable: The criterion is not relevant to the product.
- Not Evaluated: The product has not been evaluated against the criterion. This can be used only in WCAG 2.0 Level AAA.

## WCAG 2.x Report

Note: When reporting on conformance with the WCAG 2.x Success Criteria, they are scoped for full pages, complete processes, and accessibility-supported ways of using technology as documented in the <u>WCAG 2.0 Conformance Requirements</u>.

## **Table 1: Success Criteria, Level A**

Notes:

Criteria	Conformance Level	Remarks and Explanations
1.1.1 Non-text Content (Level A)	Supports	There is no audio or video content in the application
1.2.1 Audio-only and Video-only (Prerecorded) (Level A)	Supports	There is no audio or video content in the application
1.2.2 Captions (Prerecorded) (Level A)	Supports	There is no audio or video content in the application
1.2.3 Audio Description or Media Alternative (Prerecorded) (Level A)	Supports	There is no audio or video content in the application
1.3.1 Info and Relationships (Level A)	Supports	We use semantic markup to achieve this
1.3.2 Meaningful Sequence (Level A)	Supports	Usually there is more than one valid order, when an order exists it is linear and clear
1.3.3 Sensory Characteristics (Level A)	Supports	We don't use sensory characteristics as the sole way of conveying information
1.4.1 Use of Color (Level A)	Supports	We don't use color as the sole way of conveying information
1.4.2 Audio Control (Level A)	Supports	There is no audio or video content in the application
2.1.1 Keyboard (Level A)	Supports	All functionality is reachable via a keyboard interface
2.1.2 No Keyboard Trap (Level A)	Supports	
2.1.4 Character Key Shortcuts (Level A 2.1 only)	Supports	There are no character key shortcuts in the application
2.2.1 Timing Adjustable (Level A)	Supports	There are no time limits set by the content.
2.2.2 Pause, Stop, Hide (Level A)	Supports	There is no moving, blinking or otherwise auto-updating content in the application
2.3.1 Three Flashes or Below Threshold (Level A)	Supports	There is no flashing content in the application
2.4.1 Bypass Blocks (Level A)	Supports	We group content into marked up <sections> to allow this</sections>
2.4.2 Page Titled (Level A)	Supports	All pages have an appropriate title
2.4.3 Focus Order (Level A)	Supports	The focus order is linear and preserves meaning
2.4.4 Link Purpose (In Context) (Level A)	Supports	It's possible to infer what links lead to based on their text and context; we try to avoid ambiguous link labels
2.5.1 Pointer Gestures (Level A 2.1 only)	Supports	No gestures are used in the application

Criteria	Conformance Level	Remarks and Explanations
2.5.2 Pointer Cancellation (Level A 2.1 only)	Supports	Functionality is triggered on the up event
2.5.3 Label in Name (Level A 2.1 only)	Supports	Labels have the appropriate names
2.5.4 Motion Actuation (Level A 2.1 only)	Supports	Motion is not used in the application
3.1.1 Language of Page (Level A)	Supports	Page language is set on every page
3.2.1 On Focus (Level A)	Supports	When components receive focus they do not initiate a change of context
3.2.2 On Input (Level A)	Supports	Changing the content of an input element does not initiate a change of context without warning
3.3.1 Error Identification (Level A)	Supports	The application has a consistent way of displaying descriptive errors
3.3.2 Labels or Instructions (Level A)	Supports	User input boxes are clearly labeled
4.1.1 Parsing (Level A)	Supports	Markup is well formed and conforms to all applicable standards
4.1.2 Name, Role, Value (Level A)	Support	Any custom user input components have the correct names and roles

## Table 2: Success Criteria, Level AA

Notes:

Criteria	Conformance Level	Remarks and Explanations
1.2.4 Captions (Live) (Level AA)	Supports	There is no audio or video content in the application
1.2.5 Audio Description (Prerecorded) (Level AA)	Supports	There is no audio or video content in the application
1.3.4 Orientation (Level AA 2.1 only)	Supports	The application supports any orientation
1.3.5 Identify Input Purpose (Level AA 2.1 only)	Supports	Inputs have clear purpose
1.4.3 Contrast (Minimum) (Level AA)	Partially supports	Some UI elements have insufficient contrast and we are working to change these over time
1.4.4 Resize text (Level AA)	Supports	Text can be resized up to 200% without loss of content or functionality
1.4.5 Images of Text (Level AA)	Supports	Where an image of text is used there is a plain text

Criteria	Conformance Level	Remarks and Explanations
		alternative
1.4.10 Reflow (Level AA 2.1 only)	Supports	Content is always reflowed assuming a viewport of 1024px
1.4.11 Non-text Contrast (Level AA 2.1 only)	Partially supports	Some UI elements have insufficient contrast and we are working to change these over time
1.4.12 Text Spacing (Level AA 2.1 only)	Supports	Text is appropriately spaced
1.4.13 Content on Hover or Focus (Level AA 2.1 only)	Partially supports	Some popups cannot be dismissed without moving pointer hover or keyboard focus
2.4.5 Multiple Ways (Level AA)	Supports	There are multiple ways to reach different sections of the application
2.4.6 Headings and Labels (Level AA)	Supports	We use semantic markup, labels and heading tags wherever appropriate
2.4.7 Focus Visible (Level AA)	Supports	The focused element is also visually distinct from others
3.1.2 Language of Parts (Level AA)	Supports	Passages in other languages are marked up correctly
3.2.3 Consistent Navigation (Level AA)	Supports	Navigational mechanisms are consistent across pages in a set
3.2.4 Consistent Identification (Level AA)	Supports	Components are identified consistently across pages in a set
3.3.3 Error Suggestion (Level AA)	Partially supports	Not all errors suggest an acceptable alternative, we're working to change this over time
3.3.4 Error Prevention (Legal, Financial, Data) (Level AA)	Supports	The application does not trigger any legal commitments or financial transactions
4.1.3 Status Messages (Level AA 2.1 only)	Does not support	Error and status messages don't currently have names and roles. We're working to fix this in a future release

## Table 3: Success Criteria, Level AAA

Notes:

Criteria	Conformance Level	Remarks and Explanations
1.2.6 Sign Language (Prerecorded) (Level AAA)	Supports	There is no audio or video content in the application

Criteria	Conformance Level	Remarks and Explanations
1.2.7 Extended Audio Description (Prerecorded) (Level AAA)	Supports	There is no audio or video content in the application
1.2.8 Media Alternative (Prerecorded) (Level AAA)	Supports	There is no audio or video content in the application
1.2.9 Audio-only (Live) (Level AAA)	Supports	There is no audio or video content in the application
1.3.6 Identify Purpose (Level AAA 2.1 only)	Partially supports	We are gradually updating the interface so that elements beyond forms have an identified purpose
1.4.6 Contrast (Enhanced) (Level AAA)	Partially supports	Some UI elements have insufficient contrast and we are working to change these over time
1.4.7 Low or No Background Audio (Level AAA)	Supports	There is no audio or video content in the application
1.4.8 Visual Presentation (Level AAA)	Does not support	Fore- and back- colors cannot be selected by the user, widths are often wider than 80 characters
1.4.9 Images of Text (No Exception) (Level AAA)	Partially supports	We use images of text to preview PDF pages where a researcher name appears; there is a text alternative for this but the image could contain some extra information (i.e. there may be some contextual clues in the layout of the page)
2.1.3 Keyboard (No Exception) (Level AAA)	Supports	All functionality is reachable via a keyboard interface
2.2.3 No Timing (Level AAA)	Supports	The content does not rely on any timings.
2.2.4 Interruptions (Level AAA)	Does not support	It's not possible to turn off interruptions, though these are rare
2.2.5 Re-authenticating (Level AAA)	Supports	The user can pick up where they left off after reauthenticating without the loss of any data. The application maintains its state on the URL
2.2.6 Timeouts (Level AAA 2.1 only)	Supports	User inactivity does not cause data loss
2.3.2 Three Flashes (Level AAA)	Supports	There is no flashing content in the application
2.3.3 Animation from Interactions (Level AAA 2.1 only)	Does not support	It's not possible to turn off animations, though these are rare
2.4.8 Location (Level AAA)	Supports	We indicate current position within navigation bars and show a human readable description of the (user removable) filters applied within the application to get to any given set of results
2.4.9 Link Purpose (Link Only) (Level AAA)	Partially supports	The purpose of some links is only clear from the context

Criteria	Conformance Level	Remarks and Explanations
		e.g. clicking on a university name in the People tab does something different to clicking on a university in the Scholarly Articles tab
2.4.10 Section Headings (Level AAA)	Supports	Where appropriate we use section headings
2.5.5 Target Size (Level AAA 2.1 only)	Partially supports	Some buttons have a target size height of 40px, we are working to change this over time
2.5.6 Concurrent Input Mechanisms (Level AAA 2.1 only)	Supports	Users can switch between supported modalities as it suits them
3.1.3 Unusual Words (Level AAA)	Does not support	Word definitions are not currently provided in the application
3.1.4 Abbreviations (Level AAA)	Does not support	Expanding abbreviations is not currently supported in the application
3.1.5 Reading Level (Level AAA)	Does not support	The application does not provide versions of text for lower reading abilities
3.1.6 Pronunciation (Level AAA)	Does not support	Pronunciation guides are not available in the application
3.2.5 Change on Request (Level AAA)	Supports	No change in contexts occur outside of the user's control and pop-up windows are not used
3.3.5 Help (Level AAA)	Does not support	The application doesn't currently have context sensitive help. This is on our product roadmap
3.3.6 Error Prevention (All) (Level AAA)	Does not support	Forms do not currently check and confirm user input