Digital Accessibility Centre

Accessibility Audit Report

Company	Legal Services Board
Date	14th June 2019
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Document Control

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Contents

Executive Summary

An accessibility audit for Legal Services Board website was carried out by the Digital Accessibility Centre (DAC) user/technical team between the 10th and 13th June. The Legal Services Board website was assessed against the Web Content [Accessibility Guidelines WCAG 2.1](). This document incorporates the findings regarding any accessibility barriers identified during the testing process.

A high number of accessibility issues were reported by both our automated testing tools and manual user testing team. Many of the access issues reported were found to affect the majority of user groups but most specifically the vision and mobility impaired. While some of the validation errors did not directly impact on our user testing team, it does not mean that they do not have the potential to impact on other users.

Screen reader users found the general navigation of some pages difficult due to numerous interactive elements that either did not contain discernible text or were not uniquely descriptive. As a result of this some screen reader users were unable to interact with those elements independently because they could not determine their function or purpose.

Mobility impaired users encountered some elements that were not accessible to standard keyboard commands or voice activation software. Keyboard only users also reported difficulty in tracking the order in which some page elements received focus missing visible focus indicators. It was also reported that SVG images received focus when browsing in Internet Explorer. This can be disorientating for keyboard only users as it is not clear where the users focus is on the page.

Some of the colour combinations were found to have insufficient colour contrast and are likely to be difficult for some people with low vision to read. Developers must take care to ensure that colour contrast meets the minimum requirements. If the default colour scheme does not meet the minimum requirements, then an alternative colour scheme that does meet the requirements should be made available.

Usability comments have been provided by our manual user testing team. These can be found towards the end of the report and describe various aspects of the website that, although do not fail to meet the success

Audit Summary

In order for the website to be eligible for a Digital Accessibility Centre certification, and fall in line with WCAG 2.1 requirements, improvements need to be made in the following areas.

A

Link Text Colour
Hidden Skip Link
Inappropriate ARIA Role
Keyboard Access
Multiple Generic Links to Different Destinations
Links to Non-HTML Documents
On Input
Missing Title Attribute
Missing Image Alt
Non-Discernible Link Text
Expandable Content

AA

Relative Sizing
Low Colour Contrast
Missing Visible Focusable Indicator

AAA

Semantically Incorrect Headings
Readability Statistics
Links New Window
Non-Descriptive Links out of Context
Non-Descriptive Links to External Destinations

Scope

Exact Task and/or URLs are listed below along with the specific browser and AT set.
URL's:

1. Home page - https://dev.union10.co.uk/lsb/
2. Market Intelligence. - https://dev.union10.co.uk/lsb/research/market-intelligence
3. Approved Regulators - https://dev.union10.co.uk/lsb/about-us/approved-regulators
4. Contact - https://dev.union10.co.uk/lsb/enquiries/contact-us
5. News https://dev.union10.co.uk/lsb/news
6. Newsletter signup - https://dev.union10.co.uk/lsb/news/newsletter-signup
7. Member biographies - https://dev.union10.co.uk/lsb/about-us/our-board/member-biographies
8. Our work - https://dev.union10.co.uk/lsb/our-work
9. Closed applications - https://dev.union10.co.uk/lsb/our-work/statutory-decision-making/alterations-to-regulatory-arrangements/closed-applications
10. Blog Post - https://dev.union10.co.uk/lsb/news/legal-services-board-publishes-its-2019-regulatory-performance-report
11. Freedom of Information - https://dev.union10.co.uk/lsb/freedom-of-information
12. All reports - https://dev.union10.co.uk/lsb/reports

Browser matrix and Assistive Technology (AT) combinations

Desktop

User type	Code	Operating System (OS)	Browser	Assistive Technology
Blind	SR	Windows	IE11	Jaws 16
			Firefox	NVDA
Mobility (iii)	VA	Windows	IE11	Dragon Voice Activation
Mobility (iii)	KO	Windows	Chrome	Keyboard
			IE11	Keyboard
Deaf (i)	D	Windows	Firefox	-
Colour blind (ii)	CB	Windows	Chrome	System inverted colours
Dyslexia (ii)	DX	Windows	Chrome	-
Low Vision	LV	Windows	IE11	Screen Magnification
Asperger's (i)	A	Windows	Firefox	-
Cognitive Impaired/ Panic/Anxiety	Cog	Windows	IE11	-

Mobile/Tablet

User type	Code	Operating System (OS)	Browser	Assistive Technology
Blind	SR	iOS	Safari	VoiceOver
		Android	Firefox	Talkback
Mobility	KO	iOS	Safari	-
Mobility	KO	Android	Android Browser	-
Deaf	D	Android/iOS	Android browser/safari	
Colour blind/Dyslexia	CB/DX	Android/iOS	Android browser/safari	System inverted colours/colour blind checks
Low Vision	LV	Android/iOS	Android browser/safari	Screen Magnification/Resizing content

Audit Results

These are the results of the Digital Accessibility Centre accessibility audit by section.

Each area contains a reference to the WCAG success criteria, a brief overview of the issue encountered, a description of issues found along with user testing commentaries and solutions.

Link Text Colour (A)

Some links are not visually identifiable.

WCAG Reference:
1.4.1 Use of Color
Understanding Use of Color | How to Meet Use of Color
(Level A)

Issue ID: DAC_Link_Text_Colour_Issue1

URL: https://dev.union10.co.uk/lsb/

Screen Shot:

The 'UNION 10 DESIGN' link is not visually identifiable because the contrast between the link text and surrounding body text is insufficient and the link text does not include any other distinguishable characteristics. This means that some people may not be able to identify the link.

Links within a body of text are often visually identified by their display attributes. For example, removing the underline and leaving only the colour difference would mean there would be no other visual indication (besides colour alone) that a link is present.

Current Code Ref(s):

```
<a href="https://union10design.co.uk/" target="_blank">Union 10 Design</a>
```

Colour blind user comment:

"I was initially unaware that the UNION 10 DESIGN link was present until it received focus when using the keyboard to navigate page elements."

Solution:

Where links presented in a body of text are only discernible by colour alone, ensure that link text and surrounding text differ in contrast by a ratio of at least 3:1. Alternatively provide another visual indication that a link is present such as underlining.

Hidden Skip Link (A)

A skip link is available however it does not become visible when in focus the users focus does not remain within the main content of the page when this is selected.

WCAG Reference:
2.4.1 Bypass Blocks
Understanding Bypass Blocks | How to Meet Bypass Blocks
(Level A)

Issue ID: DAC_Hidden_Skip_Link_Issue1

URL: https://dev.union10.co.uk/lsb/#content

The 'Skip' link does not become visible when in focus which means that keyboard only users may struggle to determine where their focus is on the page.

Current Code Ref(s):

```
<div class="screen-reader-text skip-link">
<a href="#content" title="Skip to content">Skip to content</a>
</div>
```

Solution:

Ensure that the 'Skip to content' link becomes visible when in focus to help keyboard only users determine their position on the page. For hidden skip links that need to become visible when tabbed to consider the following:

```
.screen-reader {
            border: 0;
            clip: rect(0 0 0 0);
            height: 1px;
            margin: -1px;
            overflow: hidden;
            padding: 0;
            position: absolute;
            white-space: nowrap;
            width: 1px;
}
.screen-reader:active,
.screen-reader:focus {
            clip: auto;
            height: auto;
            margin: 0;
```

```
                overflow: visible;
                position: static;
                white-space: normal;
                width: auto;
}
```

Inappropriate ARIA Role (A)

An inappropriate ARIA role has been implemented that is not allowed for it's given element.

WCAG Reference:
4.1.2 Name, Role, Value
Understanding Name, Role, Value | How to Meet Name, Role, Value
(Level A)

1.3.1 Info and Relationships
Understanding Info and Relationships | How to Meet Info and Relationships
(Level A)

Issue ID: DAC_Inappropriate_ARIA_Role_Issue1

Page: Market intelligence | The Legal Services Board
URL: https://dev.union10.co.uk/lsb/research/market-intelligence

Screen Shot:
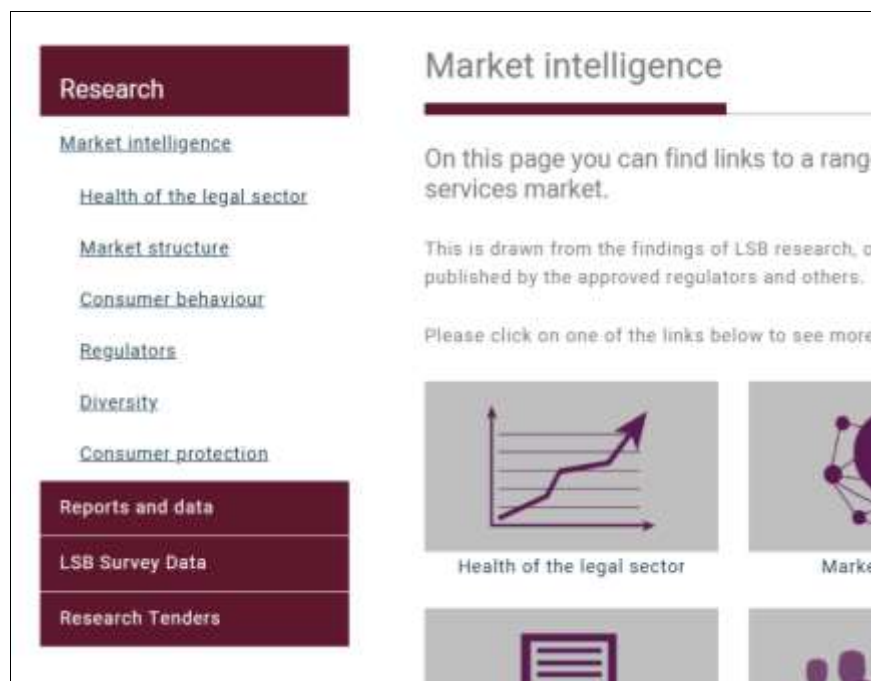
The side menu component contains an ARIA role that is not appropriate for the element: role="navigation"

This is consistent throughout where the side menu component has been implemented.

Current Code Ref(s):

```
<aside class="col col-3 top-pad bot-pad side-menu-wrap " role="navigation" aria-
label="side-menu">…</aside>
```

Solution:

Remove the ARIA role="navigation" from the next and previous carousel buttons.

Keyboard Access (A)

Some page elements are not accessible to keyboard commands.

WCAG Reference:
2.1.1 Keyboard
[Understanding Keyboard](#) | [How to Meet Keyboard](#)
(Level A)

Issue ID: DAC_Keyboard_Access_Issue1

Page: Contact us | The Legal Services Board
URL: https://dev.union10.co.uk/lsb/enquiries/contact-us

Screen Shot:
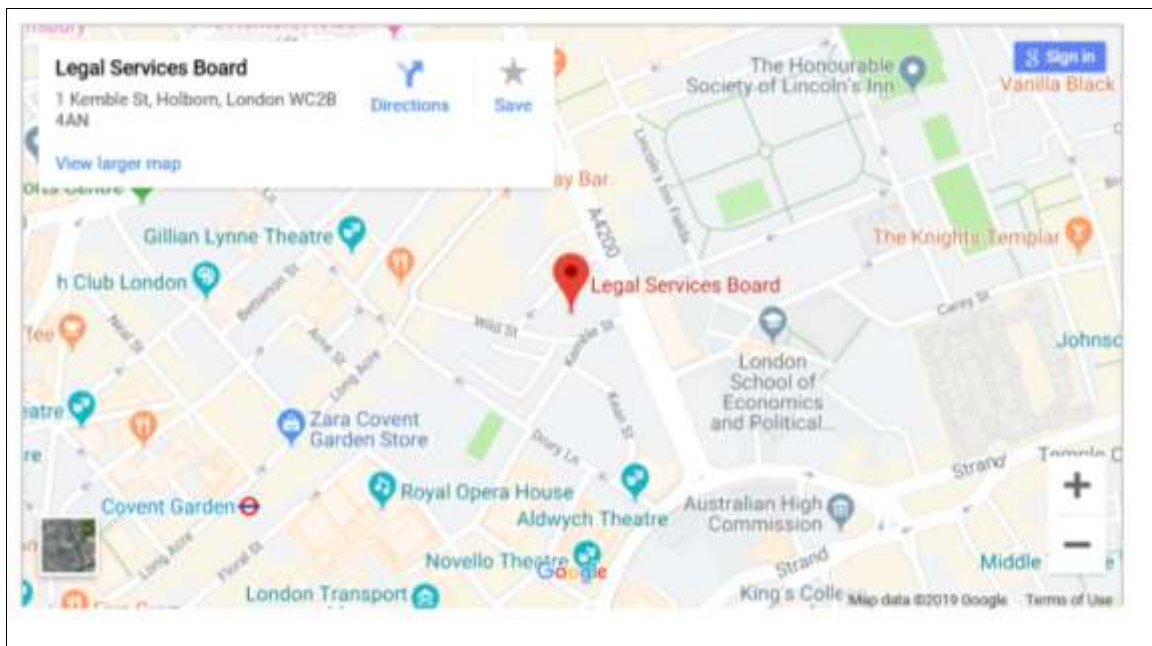
The 'Show satellite imagery' element is not accessible to standard keyboard commands.

Current Code Ref(s):

```
<div ghflowid="inset-map" class="gm-inset-map gm-inset-map-small gm-inset-light"
title="Show satellite imagery">…</div>
```

Keyboard only comments:

"While on the 'Contact Us' page the link highlighting is clear but when it came to the 'Show satellite imagery' button it did not work when pressing enter on it but it did work when I clicked on it with the mouse, but not all keyboard only users are able to use a mouse."

Solution:

Ensure that all functionality is operable through a keyboard.

Multiple Generic Links to Different Destinations (A)

Links to different destinations are present that do not contain uniquely descriptive link text.

WCAG Reference:
2.4.4 Link Purpose (In Context)
Understanding Link Purpose (In Context) | How to Meet Link Purpose (In Context)
(Level A)

Issue ID: DAC_Multiple_Generic_Links_to_Different_Destinations_Issue1

Page: News | The Legal Services Board
URL: https://dev.union10.co.uk/lsb/news

Screen Shot:
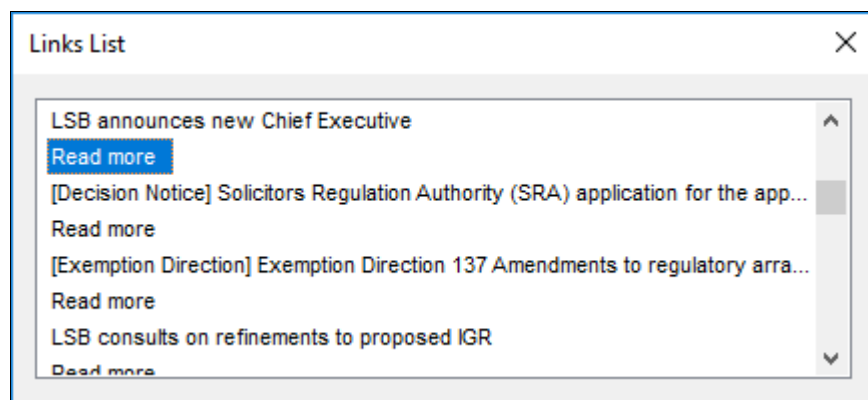
The multiple generic 'Read more' links on the 'News' page refer to different destinations however their link text does not uniquely describe their destination or purpose when navigating out of context.

Current Code Ref(s):

```
<a class="read-more" href="https://dev.union10.co.uk/lsb/news/lsb-announces-new-
chief-executive">Read more</a>
```

Screen reader comments:

"The 'read more' links are not descriptive enough for users navigating out of context."

Issue ID: DAC_Multiple_Generic_Links_to_Different_Destinations_Issue2

Page: Reports | The Legal Services Board
URL: https://dev.union10.co.uk/lsb/reports

Screen Shot:
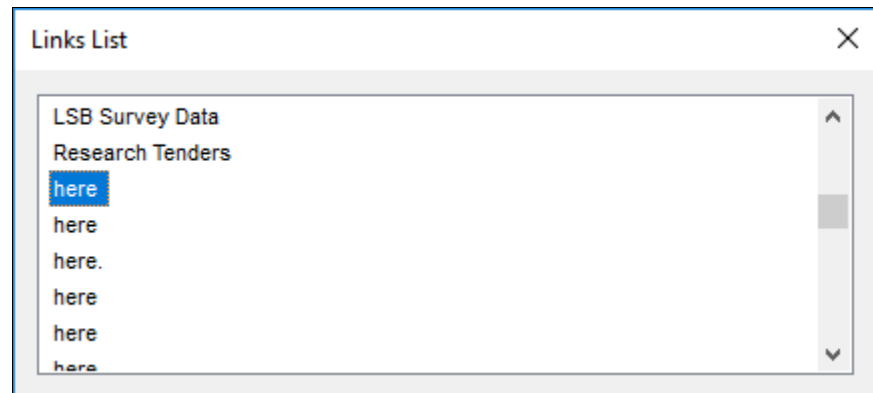
The multiple generic 'here' links on the 'Report' page refer to different destinations however their link text does not uniquely describe their destination or purpose when navigating out of context.

Current Code Ref(s):

```
<p>LSB research into levels of innovation and use of technology in
legal services, capabilities for and barriers to innovation. Read more 

<a href="https://dev.union10.co.uk/lsb/research/technology-and-innovation-in-
legal-services-2018">here</a>.</p>
```

Screen reader comments:

"The 'here' links are not descriptive enough for users navigating out of context."

Solution:

Ensure that link text is unique and descriptive to help users identify the links destination or purpose when navigating out of context. This could be visually hidden from users with CSS. For example:

Ensure that link text is unique and descriptive to help users identify the links destination or purpose when navigating out of context. This could be visually hidden from users with CSS. For example:

HTML:
```
<a class="read-more" href="https://dev.union10.co.uk/lsb/news/lsb-announces-new-
chief-executive">Read more
<span class="visuallyhidden"> about LSB announces new Chief Executive</span>
</a>
```

CSS:
```
.visuallyhidden
{
position: absolute;
width: 1px;
height: 1px;
margin: -1px;
padding: 0;
overflow: hidden;
clip: rect (0,0,0,0);
border: 0;
}
```

Links to Non-HTML Documents (A)

Multiple generic links to non-HTML documents that open in a new window are and do not indicate their file type or size are present.

WCAG Reference:
2.4.4 Link Purpose – in context
[Understanding Link Purpose (In Context)](#) | [How to Meet Link Purpose (In Context)](#)
(Level A)

3.2.5 Change on Request
[Understanding Change on Request](#) | [How to Meet Change on Request](#)
(Level AAA)

Issue ID: DAC_Links_to_Non-HTML_Documents_Issue1

Page: Closed Applications | The Legal Services Board
URL: https://dev.union10.co.uk/lsb/our-work/statutory-decision-making/alterations-to-regulatory-arrangements/closed-applications

Screen Shot:

Links to relevant documents:

- Application
- SRA Compensation Fund Rules
- SRA Indemnity Insurance Rules
- SRA Regulatory Arrangements (Indemnity Insurance) (Amendment) Rules 2018
- PII + Compensation Fund Glossary terms

Milestones:

Initial decision period is 28 days and can be extended to 90 days upon issue of an extension notice.

We have issued an extension notice which extends the initial decision period to 2 June 2019, pursuant to paragraph 21(5) of Schedule 4 to the Legal Services Act 2007.

Letter from The Law Society (TLS) dated 1 April 2019

Letter from the Legal Services Consumer Panel (LSCP) dated 11 April 2019

Response from the SRA dated 24 April 2019

Decision:

The LSB is granting the application in full. Please see our Decision Notice for more information, including the rules we are approving.

Approved Regulator:
Solicitors Regulation Authority (SRA)

Application:
Application to LSB for the approval of amendments to introduce new SRA Regulatory Arrangements (Reporting Concerns) (Amendment) Rules

Start date for 28 day initial decision period:
25 February 2019

Links to relevant documents:

- Application
- Annex 1 – Amendment Rules

The 'Closed applications' page contains a high number of generic links that refer to different non-HTML documents which open in a new browser window and do not indicate their file type or size in the link text. Failure to identify that a link is to a PDF document can cause disorientation particularly for screen reader users who are unable to see what is happening on screen. Generic link text means that screen reader users may not be able to differentiate between links to different destinations when navigating out of context.

The following are examples of multiple generic links to different destinations:
- Application
- Annex 1 (and so on…)

- Decision notice
- extension notice
- Annex A (and so on…)
- SRV response
- warning notice

Please note that due to the high number of multiple generic links on this page, there may be others that have not been listed above.

Current Code Ref(s):

```
<a
href="https://dev.union10.co.uk/lsb/Projects/statutory_decision_making/pdf/2019/F
INAL_-_SRA_application_to_LSB_-_LTTF_Comp_Fund_&amp;_PII_v1.0_04_03_19.pdf"
target="_blank" rel="noopener">Application</a>
```

```
<a
href="https://dev.union10.co.uk/lsb/Projects/statutory_decision_making/pdf/2019/L
SB%20Application%20Reporting%20Concerns%20v4%20TP%20AF%2025%20Feb%202019.pdf"
target="_blank" rel="noopener">Application</a>
```

Screen reader comments:

"Links such as 'decision notice', 'extension notice' and 'application' are duplicate links which take users to different PDF's depending on which entry the documents are included as."

Solution:

Ensure that when linking to non-HTML documents it is essential that the link text is unique, descriptive, identifies the document type and states that the document will open in a new browser window. This information needs to be included in the hyperlink text so that it can be read in the screen reader's links list when navigating out of context.

All non-HTML links should open in a new browser window. This is because a user's typical response is to close the PDF once finished. This often results in the loss of the user's browsing history (very important to screen reader users). Opening the document in a new window avoids this issue.

On input (A)

Selecting a form control does not have predictable effects and automatically updates the page.

WCAG Reference:
3.2.2 On Input
Understanding On Input |How to Meet On Input
(Level A)

Issue ID: DAC_On_Input_Issue1

Page: May 2019 | The Legal Services Board
URL: https://dev.union10.co.uk/lsb/2019/05

Screen Shot:
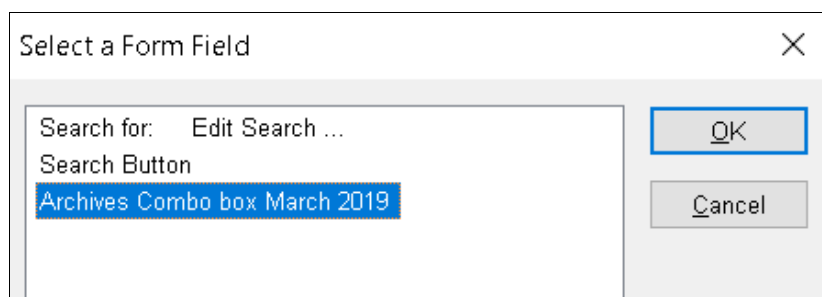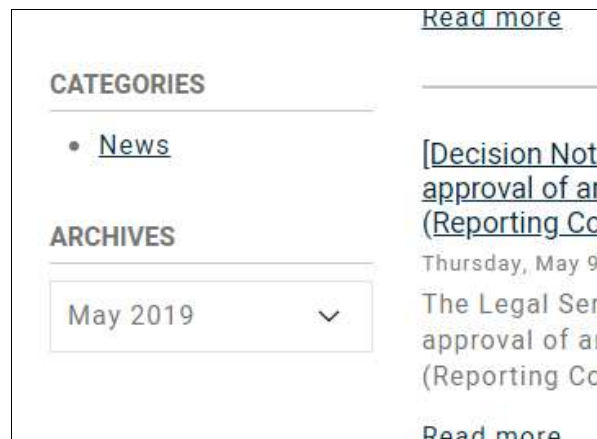
When users attempt to navigate the contents of the 'Archives' combo box using the arrow keys, the first option that receives focus is automatically selected which means users are unable to navigate the other months within the combo box without expanding the combo box list first.

Current Code Ref(s):

```
<section id="archives-2" class="widget widget_archive"><h2 class="widget-title">Archives</h2>
<label class="screen-reader-text" for="archives-dropdown-2">Archives</label>
<select id="archives-dropdown-2" name="archive-dropdown">
<option value="">Select Month</option>…</select>

<script type="text/javascript">/* <![CDATA[ */ (function() {
      var dropdown = document.getElementById( "archives-dropdown-2" );
      function onSelectChange() {
            if ( dropdown.options[ dropdown.selectedIndex ].value !== '' ) {
                  document.location.href = this.options[ this.selectedIndex
].value;
            }
      }
      dropdown.onchange = onSelectChange;
})(); /* ]]> */</script>
</section>
```

Screen reader comments:

"When attempting to select an option from the 'archives' combo box, I found that pressing the down arrow resulted in the below option being automatically selected with focus being returned to the main page. This means that users are unable to review all items in the combo box without automatic selection occurring."

Solution:

Ensure that users are able to navigate the contents of the 'Archives' combo box using the arrow keys without automatically selecting the first option that receives focus.

Missing Title Attribute (A)

Titles attributes are not available to help users identify the general purpose and content of a page or frame.

WCAG Reference:
2.4.1 Bypass Blocks
Understanding Bypass Blocks | How to Meet Bypass Blocks
(Level A)

4.1.2 Name, Role, Value
Understanding Name, Role, Value | How to Meet Name, Role, Value
(Level A)

Issue ID: DAC_Missing_Title_Attribute_Issue1

Page: Contact us | The Legal Services Board
URL: https://dev.union10.co.uk/lsb/enquiries/contact-us

Screen Shot:
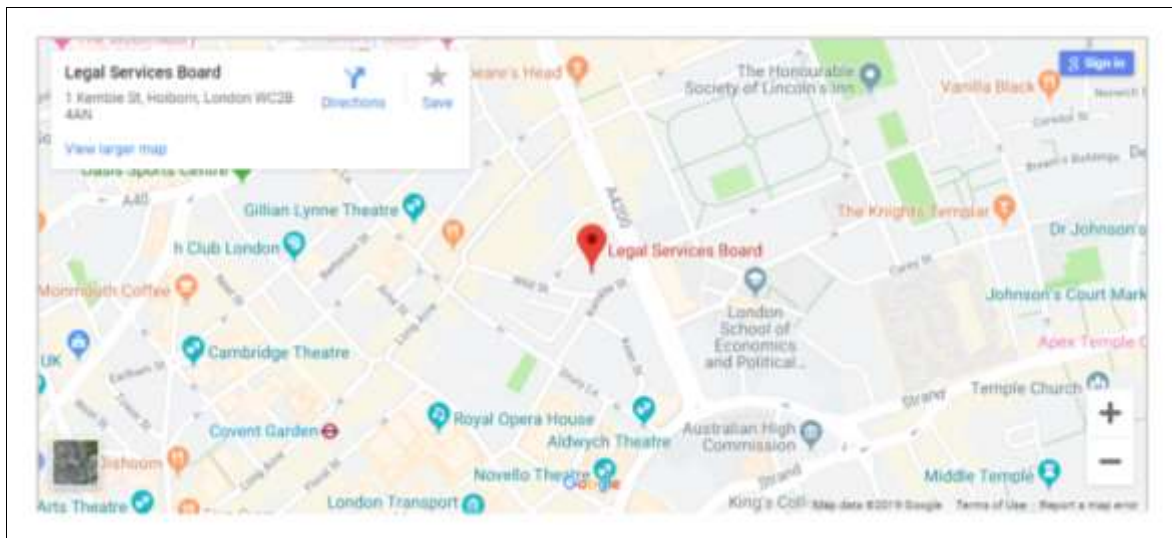
The google map is contained within an <iframe> element that does not contain a title attribute to describe its contents.

Current Code Ref(s):

```
<iframe
src="https://www.google.com/maps/embed?pb=!1m18!1m12!1m3!1d2482.9168327870116!2d-
0.12160638422975494!3d51.514741779636296!2m3!1f0!2f0!3f0!3m2!1i1024!2i768!4f13.1!
3m3!1m2!1s0x487605bfea34bd7d%3A0xd72092b84dff45d2!2sLegal+Services+Board!5e0!3m2!
1sen!2suk!4v1559662203683!5m2!1sen!2suk" width="600" height="450" frameborder="0"
style="border:0" allowfullscreen="" nuan_newframe="true"></iframe>
```

Solution:

Ensure that iframes contain non-empty title attributes that describe the contents of the
frame. For example:

```
<iframe
src="https://www.google.com/maps/embed?pb=!1m18!1m12!1m3!1d2482.9168327870116!2d-
0.12160638422975494!3d51.514741779636296!2m3!1f0!2f0!3f0!3m2!1i1024!2i768!4f13.1!
3m3!1m2!1s0x487605bfea34bd7d%3A0xd72092b84dff45d2!2sLegal+Services+Board!5e0!3m2!
1sen!2suk!4v1559662203683!5m2!1sen!2suk" width="600" height="450" frameborder="0"
style="border:0" allowfullscreen="" nuan_newframe="true" title="description of
content within iframe"></iframe>
```

Missing Image Alt (A)

Images are present that do not contain alt text attributes.

WCAG Reference:
1.1.1 Non-text Content
Understanding Non-text Content | How to Meet Non-text Content
(Level A)

Issue ID: DAC_Missing_Image_Alt_Issue1

Page: Contact us | The Legal Services Board
URL: https://dev.union10.co.uk/lsb/enquiries/contact-us

Screen Shot:
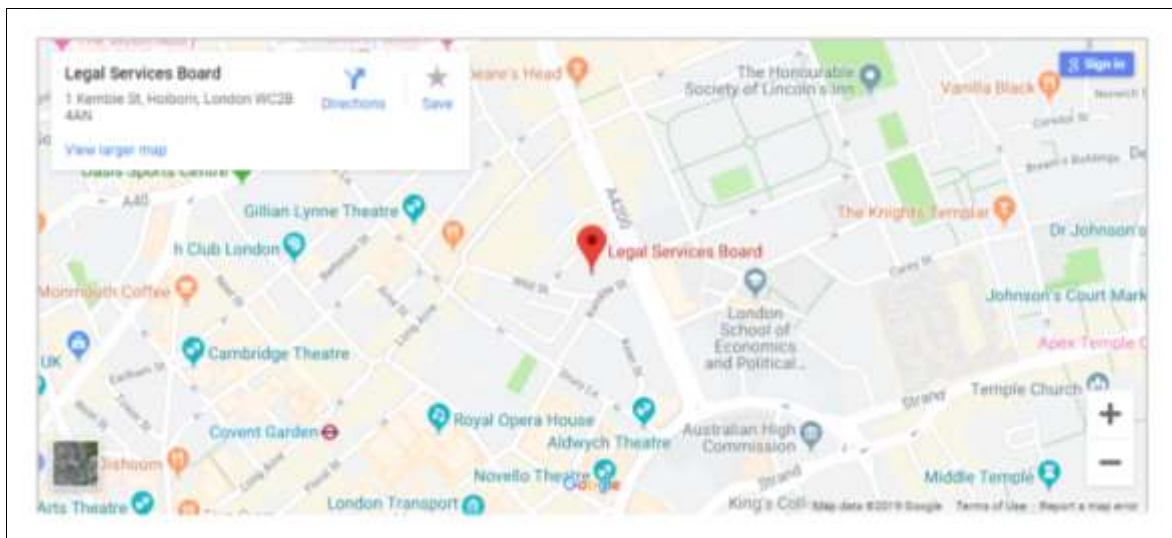
The 'Google' image related to the Goggle map contains an image that does not contain an alt attribute. This means that screen reader users may not be able to determine the content or purpose of the image.

Code Ref(s):

```
<div style="padding-bottom: 12px; z-index: 0; position: absolute; bottom: 0px;
left: 299px;">
<img src="https://maps.gstatic.com/mapfiles/embed/images/google4.png"
style="width: 52px;">
</div>
```

Page: Contact us | The Legal Services Board
URL: https://dev.union10.co.uk/lsb/enquiries/contact-us

Screen Shot:

The 'Zoom in' button related to the Goggle map contains 3 images that do not contain alt attributes. This means that screen reader users may not be able to determine the content or purpose of the image.

Code Ref(s):

```
<button draggable="false" title="Zoom in" aria-label="Zoom in" type="button"
class="gm-control-active" style="background: none; display: block; border: 0px;
margin: 0px; padding: 0px; position: relative; cursor: pointer; user-select:
none; overflow: hidden; width: 40px; height: 40px; top: 0px; left: 0px;">
<img
src="data:image/svg+xml,%3Csvg%20xmlns%3D%22http%3A%2F%2Fwww.w3.org%2F2000%2Fsvg%
22%20width%3D%2218%22%20height%3D%2218%22%20viewBox%3D%220%200%2018%2018%22%3E%0A
%20%20%3Cpolygon%20fill%3D%22%23666%22%20points%3D%2218%2C7%2011%2C7%2011%2C0%207
%2C0%207%2C7%200%2C7%200%2C11%207%2C11%207%2C18%2011%2C18%2011%2C11%2018%2C11%22%
2F%3E%0A%3C%2Fsvg%3E%0A" style="height: 18px; width: 18px;">
<img
src="data:image/svg+xml,%3Csvg%20xmlns%3D%22http%3A%2F%2Fwww.w3.org%2F2000%2Fsvg%
22%20width%3D%2218%22%20height%3D%2218%22%20viewBox%3D%220%200%2018%2018%22%3E%0A
%20%20%3Cpolygon%20fill%3D%22%23333%22%20points%3D%2218%2C7%2011%2C7%2011%2C0%207
%2C0%207%2C7%200%2C7%200%2C11%207%2C11%207%2C18%2011%2C18%2011%2C11%2018%2C11%22%
2F%3E%0A%3C%2Fsvg%3E%0A" style="height: 18px; width: 18px;">
```

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```
<img
src="data:image/svg+xml,%3Csvg%20xmlns%3D%22http%3A%2F%2Fwww.w3.org%2F2000%2Fsvg%
22%20width%3D%2218%22%20height%3D%2218%22%20viewBox%3D%220%200%2018%2018%22%3E%0A
%20%20%3Cpolygon%20fill%3D%22%23111%22%20points%3D%2218%2C7%2011%2C7%2011%2C0%207
%2C0%207%2C7%200%2C7%200%2C11%207%2C11%207%2C18%2011%2C18%2011%2C11%2018%2C11%22%
2F%3E%0A%3C%2Fsvg%3E%0A" style="height: 18px; width: 18px;">
</button>
```

Page: Contact us | The Legal Services Board
URL: https://dev.union10.co.uk/lsb/enquiries/contact-us

Screen Shot:

The 'Zoom out' button related to the Goggle map contains 3 images that do not contain alt attributes. This means that screen reader users may not be able to determine the content or purpose of the image.
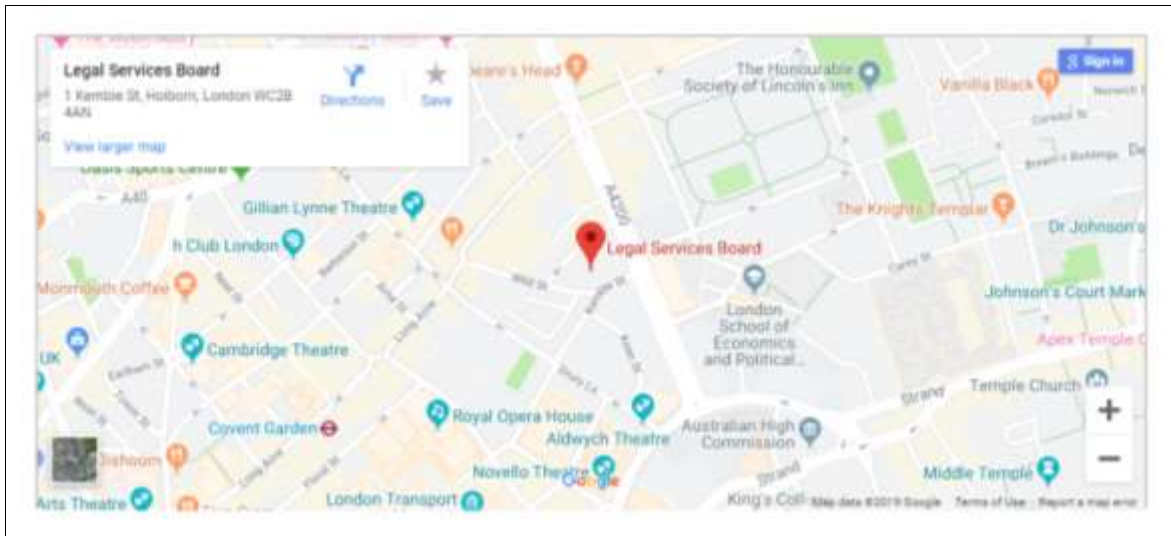
Code Ref(s):

```
<button draggable="false" title="Zoom out" aria-label="Zoom out" type="button"
class="gm-control-active" style="background: none; display: block; border: 0px;
margin: 0px; padding: 0px; position: relative; cursor: pointer; user-select:
none; overflow: hidden; width: 40px; height: 40px; top: 0px; left: 0px;">
<img
src="data:image/svg+xml,%3Csvg%20xmlns%3D%22http%3A%2F%2Fwww.w3.org%2F2000%2Fsvg%
22%20width%3D%2218%22%20height%3D%2218%22%20viewBox%3D%220%200%2018%2018%22%3E%0A
```
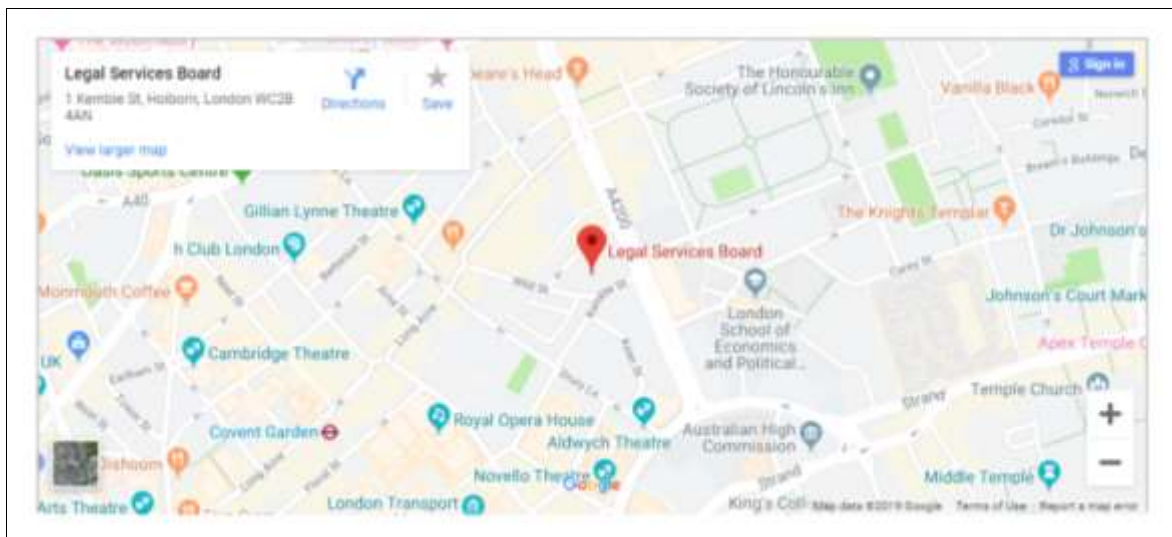
```
%20%20%3Cpath%20fill%3D%22%23666%22%20d%3D%22M0%2C7h18v4H0V7z%22%2F%3E%0A%3C%2Fsv
g%3E%0A" style="height: 18px; width: 18px;">
<img
src="data:image/svg+xml,%3Csvg%20xmlns%3D%22http%3A%2F%2Fwww.w3.org%2F2000%2Fsvg%
22%20width%3D%2218%22%20height%3D%2218%22%20viewBox%3D%220%200%2018%2018%22%3E%0A
%20%20%3Cpath%20fill%3D%22%23333%22%20d%3D%22M0%2C7h18v4H0V7z%22%2F%3E%0A%3C%2Fsv
g%3E%0A" style="height: 18px; width: 18px;">
<img
src="data:image/svg+xml,%3Csvg%20xmlns%3D%22http%3A%2F%2Fwww.w3.org%2F2000%2Fsvg%
22%20width%3D%2218%22%20height%3D%2218%22%20viewBox%3D%220%200%2018%2018%22%3E%0A
%20%20%3Cpath%20fill%3D%22%23111%22%20d%3D%22M0%2C7h18v4H0V7z%22%2F%3E%0A%3C%2Fsv
g%3E%0A" style="height: 18px; width: 18px;">
</button>
```

Solution:

Ensure that images contain alt attributes that are descriptive of the image content or purpose. Decorative images that do not convey any important information may be given a null alt attribute (`alt=""`) that will instruct screen reader software to ignore the image.

Non-Discernible Link Text (A)

Links are present that do not contain text that is visible to users of assistive technology.

WCAG Reference:

2.4.4 Link Purpose – in context

Understanding Link Purpose (In Context) | How to Meet Link Purpose (In Context)

(Level A)

4.1.2 Name, Role, Value

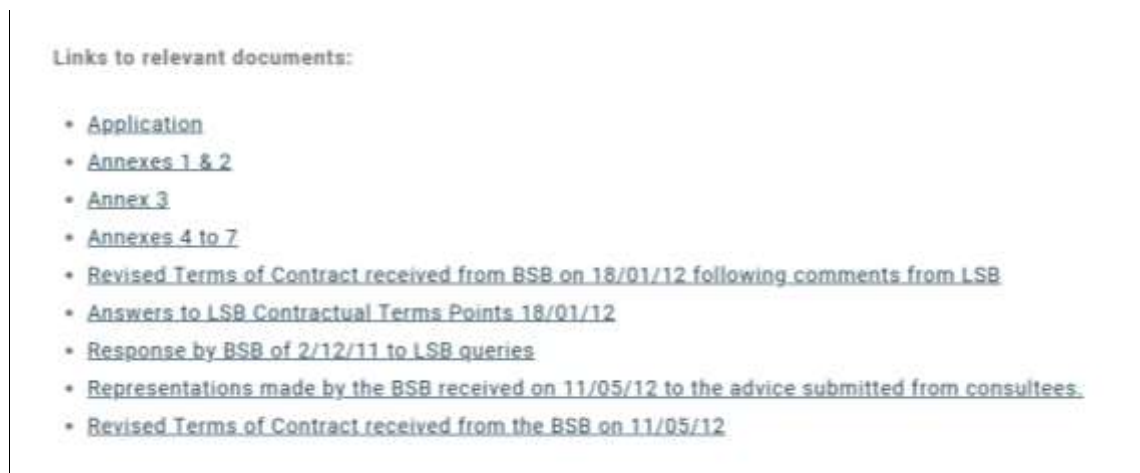Understanding Name, Role, Value | How to Meet Name, Role, Value

(Level A)

Issue ID: DAC_Non_Discernible_Link_Text_Issue1

Page: Closed applications | The Legal Services Board

URL: https://dev.union10.co.uk/lsb/our-work/statutory-decision-making/alterations-to-regulatory-arrangements/closed-applications

Screen Shot:

Links to relevant documents:

- Application
- Annexes 1 & 2
- Annex 3
- Annexes 4 to 7
- Revised Terms of Contract received from BSB on 18/01/12 following comments from LSB
- Answers to LSB Contractual Terms Points 18/01/12
- Response by BSB of 2/12/11 to LSB queries
- Representations made by the BSB received on 11/05/12 to the advice submitted from consultees.
- Revised Terms of Contract received from the BSB on 11/05/12

An empty link is present under 'Links to relevant documents' adjacent to the 'Answers to LSB Contractual Terms Points 18/01/12' link. The empty link appears to be redundant because it shares the same href as the aforementioned link and is contained within the same list element.

Current Code Ref(s):

```
<li>
<a
href="https://dev.union10.co.uk/lsb/what_we_do/regulation/pdf/answers_to_lsb_cont
ractual_terms_points_180112.pdf">Answers to LSB Contractual Terms Points
18/01/12</a>
<a
href="https://dev.union10.co.uk/lsb/what_we_do/regulation/pdf/answers_to_lsb_cont
ractual_terms_points_180112.pdf"><br>
</a>
</li>
```

Solution:

Consider removing the empty link because it appears to be redundant or provide it with uniquely descriptive link text to enable users to identify its function or purpose.

Page: Legal Services Board publishes its 2019 regulatory performance report | Legal Services Board
URL: https://dev.union10.co.uk/lsb/news/legal-services-board-publishes-its-2019-regulatory-performance-report

Screen Shot:
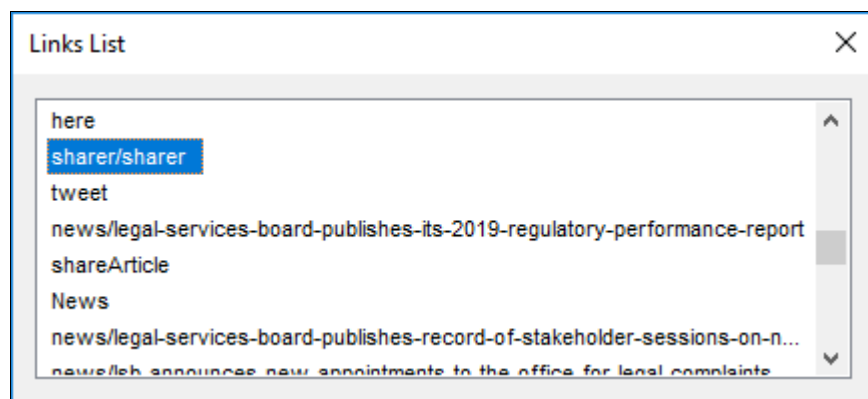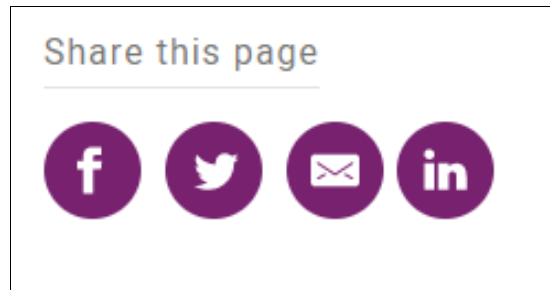
The social media links under the heading 'Share this page' do not contain discernible text. This means that screen reader users may not be able to determine their destination or purpose.

Current Code Ref(s):

```
<a class="resp-sharing-button__link"
href="https://facebook.com/sharer/sharer.php?u=https://dev.union10.co.uk/lsb/news
/legal-services-board-publishes-its-2019-regulatory-performance-report"
target="_blank" aria-label="">

<div class="resp-sharing-button--facebook resp-sharing-button--small">
```

```
<div aria-hidden="true" class="resp-sharing-button__icon resp-sharing-
button__icon--solid">

<svg xmlns="https://www.w3.org/2000/svg" viewBox="0 0 24
24">…</svg></div></div></a>
```

Solution:

Ensure that links contain discernible link text that is visible to users of assistive technology and are descriptive of their destination or purpose. For example:

```
<a class="resp-sharing-button__link"
href="https://facebook.com/sharer/sharer.php?u=https://dev.union10.co.uk/lsb/news
/legal-services-board-publishes-its-2019-regulatory-performance-report"
target="_blank" aria-label="Share this page on Facebook">

<div class="resp-sharing-button resp-sharing-button--facebook resp-sharing-
button--small">

<div aria-hidden="true" class="resp-sharing-button__icon resp-sharing-
button__icon--solid">

<svg xmlns="https://www.w3.org/2000/svg" viewBox="0 0 24
24">…</svg></div></div></a>
```
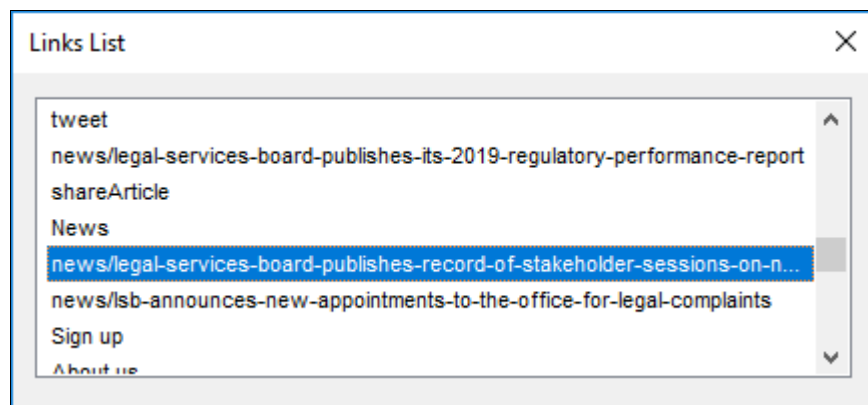
Page: Legal Services Board publishes its 2019 regulatory performance report | Legal Services Board
URL: https://dev.union10.co.uk/lsb/news/legal-services-board-publishes-its-2019-regulatory-performance-report

Screen Shot:

This entry was posted in News

Links List   ✕

tweet
news/legal-services-board-publishes-its-2019-regulatory-performance-report
shareArticle
News
news/legal-services-board-publishes-record-of-stakeholder-sessions-on-n...
news/lsb-announces-new-appointments-to-the-office-for-legal-complaints
Sign up
About us

The previous and next links do not contain discernible text. This means that screen reader users may not be able to determine their destination or purpose.

Current Code Ref(s):

```
<div class="nav-previous">

<a href="https://dev.union10.co.uk/lsb/news/legal-services-board-publishes-
record-of-stakeholder-sessions-on-new-internal-governance-rules" rel="prev">

<div alt="Previous Post Legal Services Board publishes record of stakeholder
sessions on new Internal Governance Rules" title="View Legal Services Board
publishes record of stakeholder sessions on new Internal Governance Rules ">
```

```
<p class="no-bot-marg"> </p>
<div class="nav-left-arrow">
</div></div>
</a>
</div>
```

Solution:

Ensure that links have text that is visible to screen reader users to help them identify the links destination or purpose. This could be achieved by implementing aria-labels or link text that has been visually using CSS. For example:

```
<div class="nav-previous">

<a href="https://dev.union10.co.uk/lsb/news/legal-services-board-publishes-
record-of-stakeholder-sessions-on-new-internal-governance-rules" rel="prev" aria-
label="Previous Post">

<div alt="Previous Post Legal Services Board publishes record of stakeholder
sessions on new Internal Governance Rules" title="View Legal Services Board
publishes record of stakeholder sessions on new Internal Governance Rules ">

<p class="no-bot-marg"> </p>
<div class="nav-left-arrow">
</div></div>
</a>
</div>
```

Expandable Content (A)

The state of accordion menu buttons is not identified.

WCAG Reference:
4.1.2 Name, Role, Value
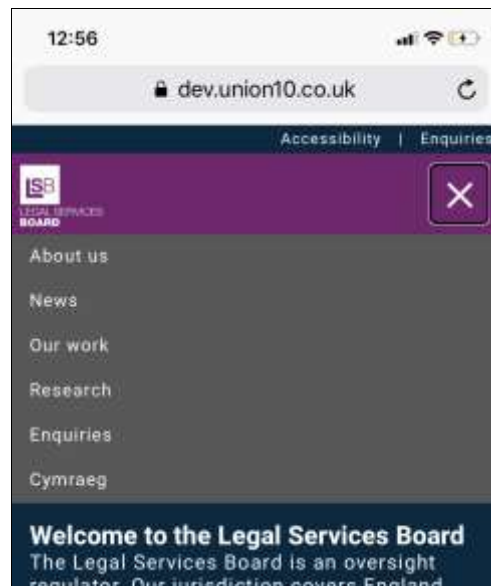Understanding Name, Role, Value | How to Meet Name, Role, Value
(Level A)

Issue ID: DAC_Expandible_Content_Issue1

Page: home
URL: https://dev.union10.co.uk/lsb/

Screen Shot:

The hamburger menu button does not indicate to the user that it is expandable or collapsible. This is means that some VoiceOver users may be unaware that additional content is available.

Code Ref(s):

```
<a href="#menu-footer-col-1" id="menu-button" aria-label="menu">
<span></span>
<span></span>
<span></span>
<span></span>
</a>
```

Screen reader comments:

"While viewing the page in context I located a hamburger menu. VoiceOver did not announce when the menu was expanded/collapsed. Giving the user this information will enable users to understand when the menu content is available or hidden, and that there is additional content within the menu."

Solution:

Ensure that the state of the expandable and collapsible content is identified. For example, the elements should be read as expandable or collapsible content. Consider providing aria-expanded="false" and change the value of the aria-expanded attribute as per the action.

Relative Sizing (AA)

Content is lost or truncated when the page is magnified to 200%.

WCAG Reference:
1.4.4 Resize text
Understanding Resize text | How to Meet Resize text
(Level AA)

Issue ID: DAC_Relative_Sizing_Issue1

1. Home page - https://dev.union10.co.uk/lsb/
2. Market Intelligence. - https://dev.union10.co.uk/lsb/research/market-intelligence
3. Approved Regulators - https://dev.union10.co.uk/lsb/about-us/approved-regulators
4. Contact - https://dev.union10.co.uk/lsb/enquiries/contact-us
5. News https://dev.union10.co.uk/lsb/news
6. Newsletter signup - https://dev.union10.co.uk/lsb/news/newsletter-signup

7. Member biographies - https://dev.union10.co.uk/lsb/about-us/our-board/member-biographies
8. Our work - https://dev.union10.co.uk/lsb/our-work
9. Closed applications - https://dev.union10.co.uk/lsb/our-work/statutory-decision-making/alterations-to-regulatory-arrangements/closed-applications
10. Blog Post - https://dev.union10.co.uk/lsb/news/legal-services-board-publishes-its-2019-regulatory-performance-report
11. Freedom of Information - https://dev.union10.co.uk/lsb/freedom-of-information
12. All reports - https://dev.union10.co.uk/lsb/reports

Screen Shot:

The email address presented under 'Enquiries' is truncated when the page is magnified up to 200%. This appears to be consistent throughout the pages listed above.

Current Code Ref(s):

```
<a
href="mailto:contactus@legalservicesboard.org.uk">contactus@legalservicesboard.or
g.uk</a>
```

Solution:

Ensure that text can be magnified up to 200% without loss of content or functionality so that it can be read by people with low vision without requiring the use of assistive technology such as a screen magnifier.

Low Colour Contrast (AA)

Page elements are present that do not meet the minimum colour contrast requirements.

WCAG Reference:
1.4.3 Contrast (Minimum)
Understanding Contrast (Minimum) | How to Meet Contrast (Minimum)
(Level AA)

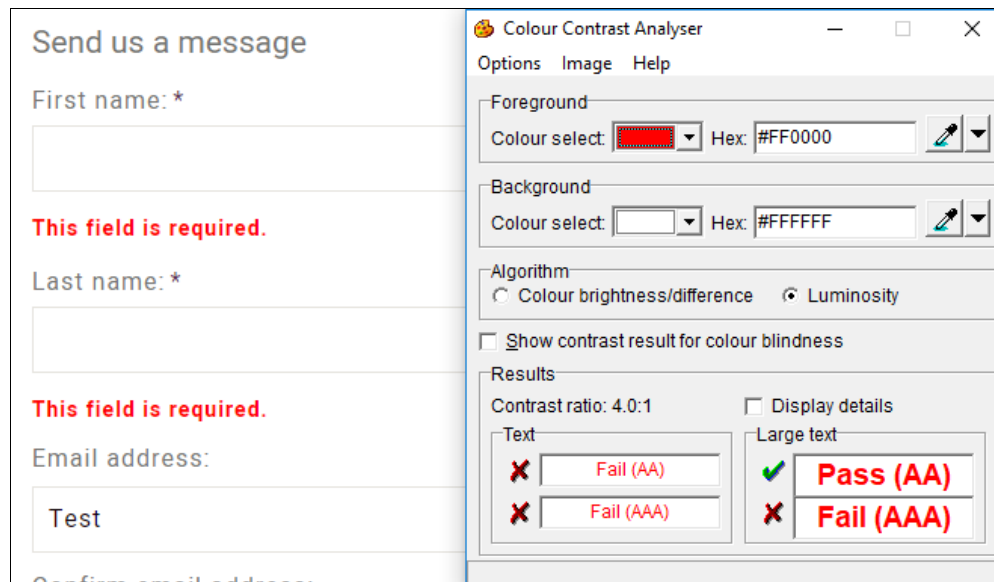Issue ID: DAC_Low_Colour_Contrast_Issue1

Page: Contact us | The Legal Services Board
URL: https://dev.union10.co.uk/lsb/enquiries/contact-us

Screen Shot:

The error messages that are presented when validation errors occur have insufficient colour contrast of 3.99 (foreground colour: #ff0000, background colour: #ffffff, font size: 10.5pt, font weight: bold). The expected minimum colour contrast ratio for text of this size and weight is 4.5:1.

Current Code Ref(s):

```
<div id="validation_message_1_1" class="gfield_description validation_message"
aria-live="polite">This field is required.</div>
```
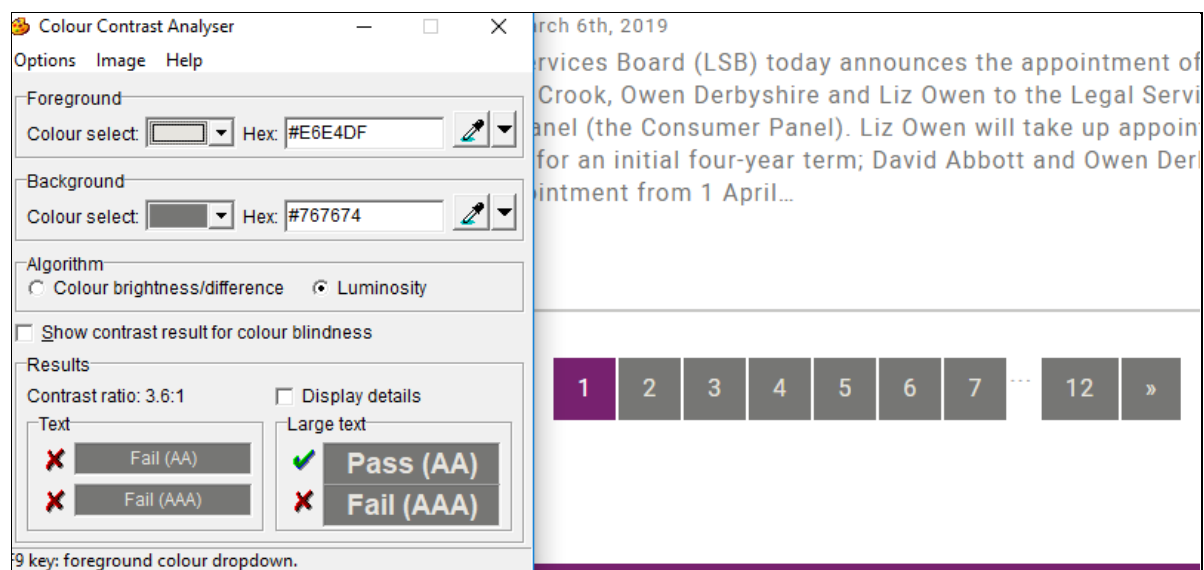
Colour blind user comments:

"On this section is red on a white background, which may be difficult for some users to see."

Issue ID: DAC_Low_Colour_Contrast_Issue2

Page: News | The Legal Services Board
URL: https://dev.union10.co.uk/lsb/news

Screen Shot:

The pagination links that are not in focus have insufficient colour contrast of 3.58 (foreground colour: #e6e4df, background colour: #767674, font size: 12.0pt, font weight: normal). The expected minimum colour contrast ratio for text of this size and weight is 4.5:1.

Current Code Ref(s):

```
<li><a href="https://dev.union10.co.uk/lsb/news/page/2" title="2"
class="page">2</a></li>
```

Colour blind user comments:

"On this section is red on a white background, which may be difficult for some users to see."

Solution:

Ensure that the contrast between text and the background is in accordance with WCAG 2.1 recommendations:

- If the text is not bold and its size is less than 18pt then it must meet a minimum colour contrast ratio of 4.5:1 to Pass AA.
- If the text is not bold and its size is at least 18pt then it must meet a minimum colour contrast ratio of 3:1 to Pass AA.
- If the text is bold and its size is less than 14pt then it must meet a minimum colour contrast ratio of 4.5:1 to Pass AA.
- If the text is bold and its size is at least 14pt then it must meet a minimum colour contrast ratio of 3:1 to Pass AA.

If the default colour scheme does not meet the minimum requirements, then an alternative style sheets that do meet the requirements should be made available.

Missing Visible Focus Indicator (AA)

Some Interactive page elements are not highlighted by a visible focus indicator.

WCAG Reference:
2.4.7 Focus Visible
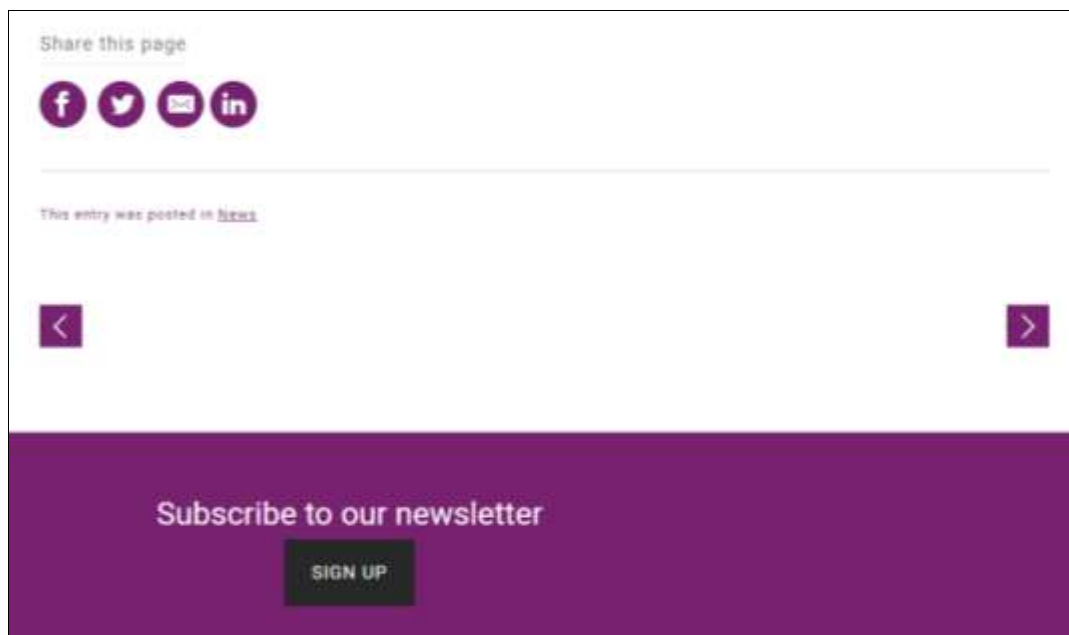[Understanding Focus Visible](#) | [How to Meet Focus Visible](#)
(Level AA)

Issue ID: DAC_Missing_Visible_Focus_Indicator_Issue1

Page: Legal Services Board publishes its 2019 regulatory performance report | The Legal Services Board
URL: https://dev.union10.co.uk/lsb/news/legal-services-board-publishes-its-2019-regulatory-performance-report

Screen Shot:

The previous and next buttons on the 'Legal Services Board publishes its 2019 regulatory performance report' page are not highlighted by a visible focus indicator when in focus. This means that keyboard only users may struggle to determine where their focus is on the page.

Current Code Ref(s):

```
<a href="https://dev.union10.co.uk/lsb/news/legal-services-board-publishes-
record-of-stakeholder-sessions-on-new-internal-governance-rules" rel="prev">
<div alt="Previous Post Legal Services Board publishes record of stakeholder
sessions on new Internal Governance Rules" title="View Legal Services Board
publishes record of stakeholder sessions on new Internal Governance Rules ">
<p class="no-bot-marg"> </p>
<div class="nav-left-arrow"></div>
</div>
</a>
```

```
<a href="https://dev.union10.co.uk/lsb/news/lsb-announces-new-appointments-to-
the-office-for-legal-complaints" rel="next">
<div alt="Newer Post LSB announces new appointments to the Office for Legal
Complaints" title="View LSB announces new appointments to the Office for Legal
Complaints "><p class="no-bot-marg"> </p>
<div class="nav-right-arrow"></div>
</div>
</a>
```

Keyboard only comments:

"There is no link highlighting on the next or previous links as shown in the above screen shots meaning the user is unaware where they are on the page, the link highlighting disappears after the News link then appears again on the sign-up button."

Solution:

Ensure that interactive page elements are highlighted by a visible focus indicator when in focus. This will enable keyboard only users to determine where their focus is on the page when navigating via keyboard commands. A visible focus indicator can be set using CSS. For example:

```
:focus :hover {
border: 2px solid #f00;
outline: 2px solid #f00;
}
```

Semantically Incorrect Headings (AAA)

Headings are not presented in a logical and hierarchical order.
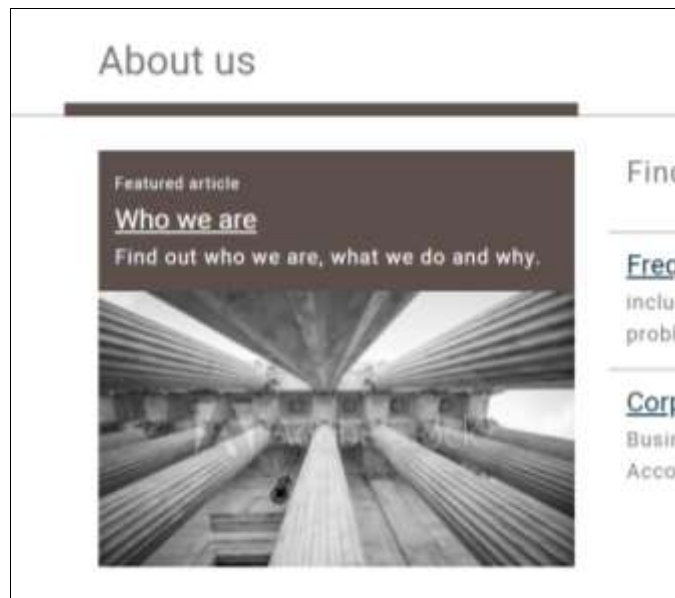
WCAG Reference:

2.4.10 Section Headings

[Understanding Section Headings](#) | [How to Meet Section Headings](#)
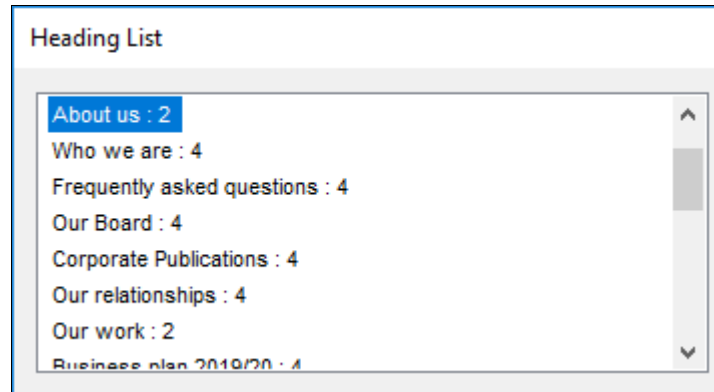
(Level AAA)

Issue ID: DAC_Semantically_Incorrect_Headings_Issue1

Page: Home | The Legal Services Board

URL: https://dev.union10.co.uk/lsb/

Screen Shot:

Heading List

About us : 2
Who we are : 4
Frequently asked questions : 4
Our Board : 4
Corporate Publications : 4
Our relationships : 4
Our work : 2
Business plan 2019/20 : 4

The headings under 'About us', 'Our work' and 'Research' are not logical because they increase by more than one heading level. This means that screen reader users may not be able to determine the structure of content on the page.

Current Code Ref(s):

```
<h4 class=" bot-tiny-marg underline white">Who we are</h4>
```

Screen reader comments:

"There is an illogical headings structure on this page as headings move from level 2 to 4. For users who primarily use the headings structure to navigate it would be beneficial if the heading level 1 were the first heading on the page and if headings proceeded consecutively. This will help users to remain orientated. Consistent across all pages."
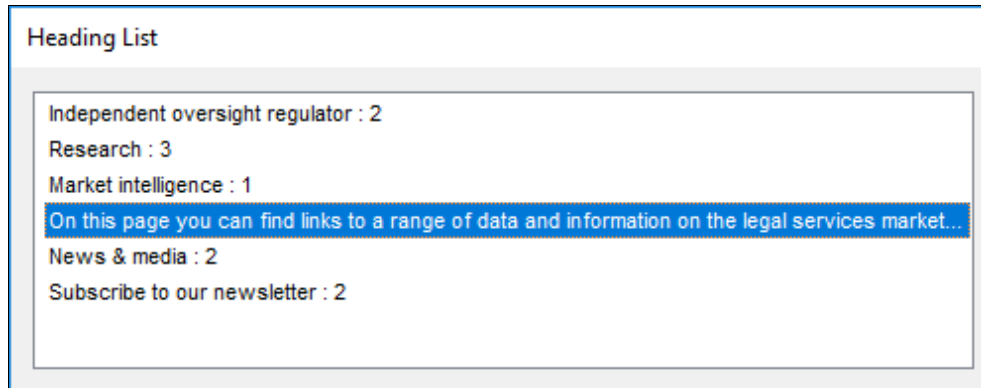
Issue ID: DAC_Semantically_Incorrect_Headings_Issue2

Page: Market Intelligence | The Legal Services Board
URL: https://dev.union10.co.uk/lsb/research/market-intelligence

Screen Shot:

Heading List

Independent oversight regulator : 2
Research : 3
Market intelligence : 1
On this page you can find links to a range of data and information on the legal services market...
News & media : 2
Subscribe to our newsletter : 2

The headings under 'Market intelligence' are not logical because they increase by more than one heading level. This means that screen reader users may not be able to determine the structure of content on the page.
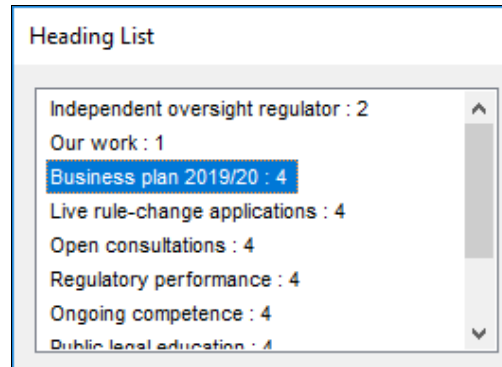
Current Code Ref(s):

```
<h3>On this page you can find links to a range of data and information on the
legal services market.</h3>
```

Page: Our work | The Legal Services Board
URL: https://dev.union10.co.uk/lsb/our-work

Screen Shot:

Heading List

Independent oversight regulator : 2
Our work : 1
Business plan 2019/20 : 4
Live rule-change applications : 4
Open consultations : 4
Regulatory performance : 4
Ongoing competence : 4
Public legal education : 4

The headings under 'Market intelligence' are not logical because they increase by more than one heading level. This means that screen reader users may not be able to determine the structure of content on the page.

Current Code Ref(s):

```
<h4 class=" bot-tiny-marg underline white">Business plan 2019/20</h4>
```

Solution:

Ensure headings are presented in a logical and hierarchical order, primarily to make it easy for screen readers to navigate the page. Screen reader users can make use of headings to jump to relevant content within the document and greatly reduce the time that they spend looking for content on a page. Headers should be logical and reflect the structure of information on the page, briefly introducing the topic(s) that follow them. For example:

```
<h1>Main heading</h1>
      <h2>Sub-heading of h1</h2>
      <h2>Sub-heading of h1</h2>
            <h3>Sub-heading of h2</h3>
      <h2>Sub-heading of h1</h2>
            <h3>Sub-heading of h2</h3>
                  <h4>Sub-heading of h3</h4>
      <h2>Sub-heading of h1</h2>
      <h2>Sub-heading of h1</h2>
```

Readability Statistics (AAA)

Some page content may be difficult to read for some users.

WCAG Reference:
3.1.5 Reading Level
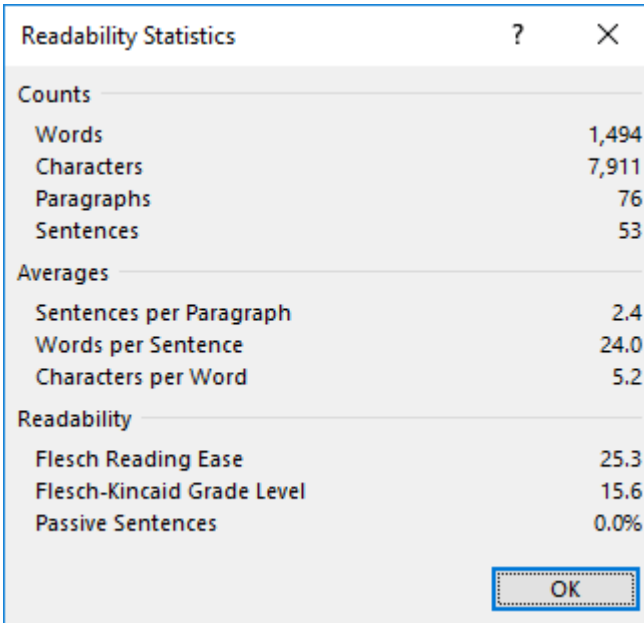Understanding Reading Level | How to Meet Reading Level
(Level AAA)

Issue ID: DAC_Readability_Statistics_Issue1

Page: Members biographies | The Legal Services Board
URL: https://dev.union10.co.uk/lsb/about-us/our-board/member-biographies

Screen Shot:

Readability Statistics	?	✕
Counts		
Words		1,494
Characters		7,911
Paragraphs		76
Sentences		53
Averages		
Sentences per Paragraph		2.4
Words per Sentence		24.0
Characters per Word		5.2
Readability		
Flesch Reading Ease		25.3
Flesch-Kincaid Grade Level		15.6
Passive Sentences		0.0%
		OK

The grade level of a web page should be at most 12 (the average age of the UK school leaver) or below. The grade level of this page is 15.6 which means it might be too difficult for some users to understand.
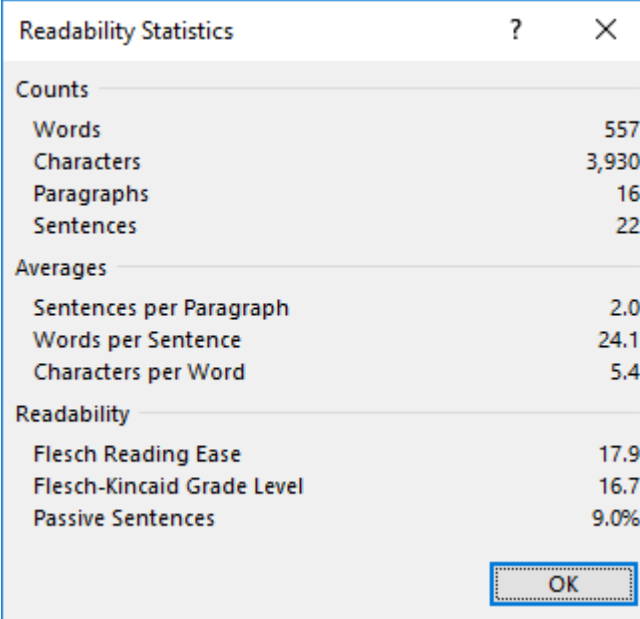
Dyslexic user comments:

"Found it difficult to get through the page as some of the words were a bit difficult for me to understand and it took me longer to get through the amount of information."

Page: Legal Services Board publishes its 2019 regulatory performance report
URL: https://dev.union10.co.uk/lsb/news/legal-services-board-publishes-its-2019-regulatory-performance-report

Screen Shot:

Readability Statistics	? ✕
Counts	
Words	557
Characters	3,930
Paragraphs	16
Sentences	22
Averages	
Sentences per Paragraph	2.0
Words per Sentence	24.1
Characters per Word	5.4
Readability	
Flesch Reading Ease	17.9
Flesch-Kincaid Grade Level	16.7
Passive Sentences	9.0%
	OK

The grade level of a web page should be at most 12 (the average age of the UK school leaver) or below. The grade level of this page is 16.7 which means it might be too difficult for some users to understand.

Dyslexic user comments:

"Found it difficult to get through the page as some of the words were a bit difficult for me to understand and it took me longer to get through the amount of information."

Solution:

Ensure that text content is readable and understandable using language appropriate for the target audience.

Links New Window (AAA)

Links are present that do not indicate that they will open in a new browser window.

WCAG Reference:
3.2.5 Change on Request
[Understanding Change on Request](#) | [How to Meet Change on Request](#)
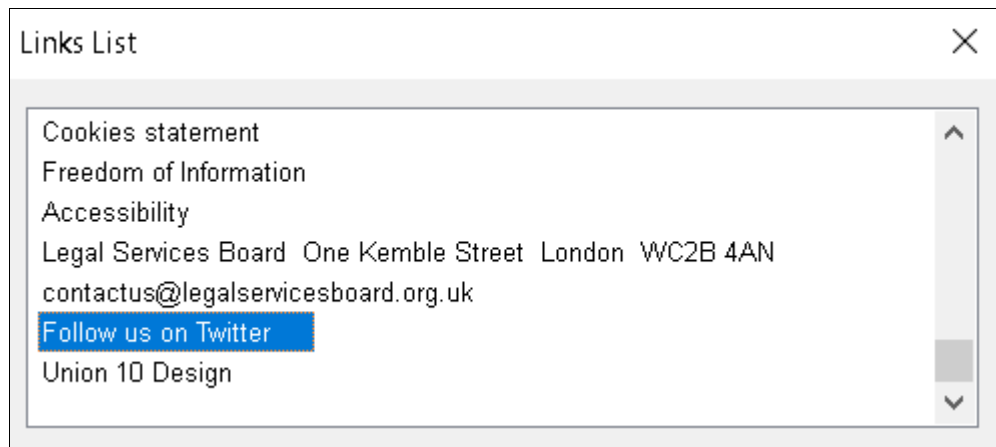(Level AAA)

Issue ID: DAC_Links_New_Window_Issue1

Page: Home | The Legal Services Board
URL: https://dev.union10.co.uk/lsb/#content

Screen Shot:

The 'Follow us on Twitter' link opens in a new browser window without informing the user. This can be disorientating for screen reader users who may not know that the window has opened.

Code Ref(s):

```
<a class="social-icon-link social-icon" target="_blank"
href="https://twitter.com/LSB_EngandWal" alt="Follow The Legal Services Board on
Twitter" title="The Twitter profile for The Legal Services Board">
<svg xmlns="https://www.w3.org/2000/svg" viewBox="0 0 24 24">…</svg>
<p class="no-bot-marg">Follow us on Twitter</p>
</a>
```

Screen reader comments:

"There is a 'follow us on twitter' link in the footer of the page which does not include the information within the link text that a new window will be opened when activating the link. It is important to include this information within the link text as this may affect how users interact with the landing page. Consistent for all pages."

Solution:

Ensure that links that open in a new browser window are easily identifiable by all users. This could be achieved by providing an icon to indicate the link will open a new browser window accompanied by text that can be visually hidden from users with CSS. For example:

HTML:

```
<a class="social-icon-link social-icon" target="_blank"
href="https://twitter.com/LSB_EngandWal" alt="Follow The Legal Services Board on
Twitter" title="The Twitter profile for The Legal Services Board">
<svg xmlns="https://www.w3.org/2000/svg" viewBox="0 0 24 24">…</svg>
<p class="no-bot-marg">Follow us on Twitter
<span class="visuallyhidden">(link opens in a new window)</span></p>
</a>
```

CSS:

```
.visuallyhidden
{
position: absolute;
width: 1px;
height: 1px;
margin: -1px;
padding: 0;
overflow: hidden;
clip: rect (0,0,0,0);
border: 0;
}
```

Non-Descriptive Links out of Context (AAA)

Multiple generic links are present that are not descriptive out of context.
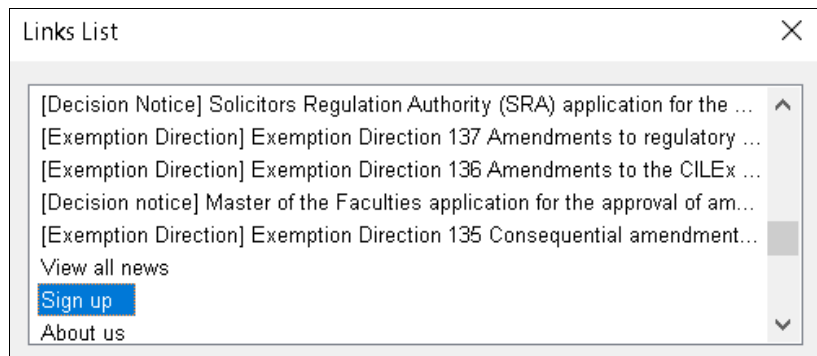
WCAG Reference:
2.4.9 Link Purpose (Link Only)
[Understanding Link Purpose (Link Only)](#) | [How to Meet Link Purpose (Link Only)](#)
(Level AAA)

Issue ID: DAC_Non-Descriptive_Links_out_of_Context_Issue1

Page: Home | The Legal Services Board
URL: https://dev.union10.co.uk/lsb/

Screen Shot:

The 'Sign up' link present in the footer is not descriptive of its destination or purpose when navigating out of context.

Current Code Ref(s):

```
<a class="button" href="https://dev.union10.co.uk/lsb/news/newsletter-signup">
Sign up </a>
```

Screen reader comments:

"The link text 'Sign up' would benefit from having more information added for users navigating out of context, such as 'Sign up for our newsletter'. This will ensure that all users are fully aware of the purpose of the link. This is consistent across all pages."

Solution:

Ensure that link text is unique and descriptive to help users identify the links destination or purpose when navigating out of context. This could be visually hidden from users with CSS. For example:

HTML:
```
<a class="button" href="https://dev.union10.co.uk/lsb/news/newsletter-signup">
Sign up </a>
<span class="visuallyhidden"> to our newsletter</span>
</a>
```

CSS:
```
.visuallyhidden
{
position: absolute;
width: 1px;
height: 1px;
margin: -1px;
padding: 0;
overflow: hidden;
clip: rect (0,0,0,0);
border: 0;
}
```

Issue ID: DAC_Non-Descriptive_Links_out_of_Context_Issue2

Page: Approved regulators | The Legal Services Board
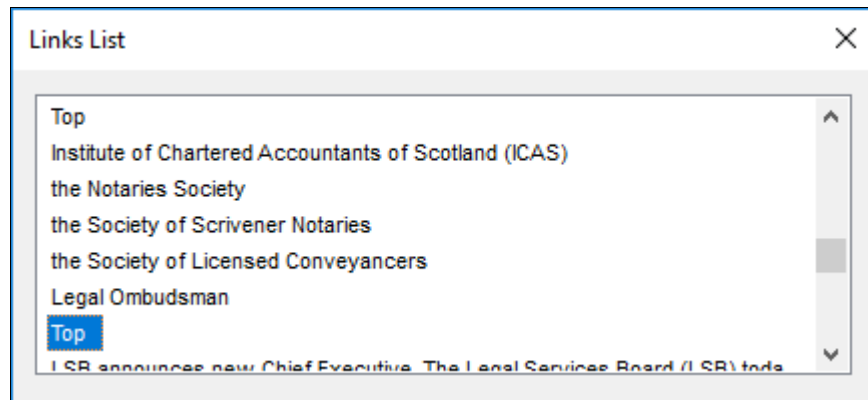URL: https://dev.union10.co.uk/lsb/about-us/approved-regulators

Page: Closed applications | The Legal Services Board
URL: https://dev.union10.co.uk/lsb/our-work/statutory-decision-making/alterations-to-regulatory-arrangements/closed-applications#content

Screen Shot:

The in-page 'Top' links present on some pages (listed above) are not descriptive of their destination or purpose when navigating out of context.

Current Code Ref(s):

```
<div class="right top-med-pad">
<a class="go-top" href="#content">Top</a>
</div>
```

Screen reader comments:

"The link text 'Top' would benefit from having more information added for users navigating out of context, such as 'Return to Top of the Page'. This will ensure that all users are fully aware of the purpose of the link. This is consistent across all pages."

Solution:

Ensure that link text is unique and descriptive to help users identify the links destination or purpose when navigating out of context. This could be visually hidden from users with CSS. For example:

HTML:
```
<div class="right top-med-pad">
<a class="go-top" href="#content">
<span class="visuallyhidden">Skip to </span>
Top
</a>
</div>
```
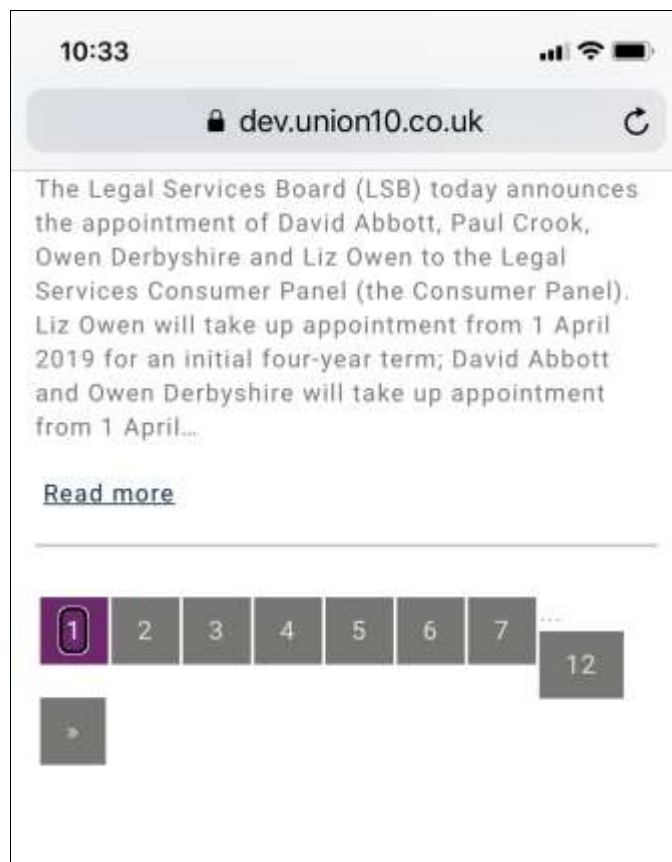
CSS:
```
.visuallyhidden
{
position: absolute;
width: 1px;
height: 1px;
margin: -1px;
padding: 0;
overflow: hidden;
clip: rect (0,0,0,0);
border: 0;
}
```

Issue ID: DAC_Non-Descriptive_Links_out_of_Context_Issue3

Page: News | The Legal Services Board
URL: https://dev.union10.co.uk/lsb/news

Screen Shot:

DAC | Accessibility Report

The numbered pagination links present near the bottom of the page are descriptive of their destination or purpose.

Current Code Ref(s):

```
<ol class="wp-paginate font-inherit">
<li><span class="title">Pages:</span></li>
<li><span class="page current">1</span></li>
<li><a href="https://dev.union10.co.uk/lsb/news/page/2" title="2"
class="page">2</a></li>…</ol>
```

Screen reader comments:

"While viewing the page in context I found that there are page numbers that take users to different pages of news stories. The page links require more context for users to understand what the numbers refer to."

Solution:

Ensure that link text is unique and descriptive to help users identify the links destination or purpose when navigating out of context. This could be visually hidden from users with CSS. For example:

```
<ol class="wp-paginate font-inherit">
<li><span class="title">Pages:</span></li>
<li><span class="page current">1</span></li>
<li><a href="https://dev.union10.co.uk/lsb/news/page/2" title="2" class="page"
aria-label="Page 2 of 12">2</a></li>…</ol>
```

Issue ID: DAC_Non-Descriptive_Links_out_of_Context_Issue4

Page: Closed applications | The Legal Services Board
URL: https://dev.union10.co.uk/lsb/our-work/statutory-decision-making/alterations-to-regulatory-arrangements/closed-applications#content
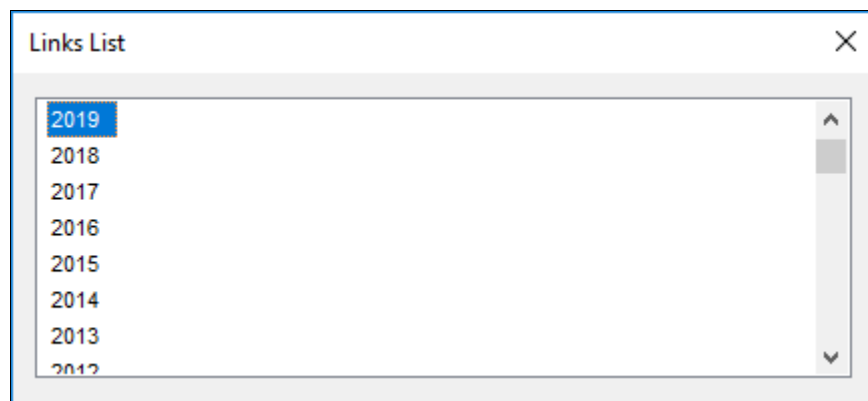
Screen Shot:

The in-page skip links related to different years under the heading 'Closed applications' are is not descriptive of their destination or purpose when navigating out of context.

Current Code Ref(s):

```
<a href="#2019">2019</a>
```

Solution:

Ensure that link text is unique and descriptive to help users identify the links destination or purpose when navigating out of context. This could be visually hidden from users with CSS. For example:

HTML:
```
<a href="#2019">
<span class="visuallyhidden">Skip to </span>
2019</a>
</div>
```

CSS:
```
.visuallyhidden
{
position: absolute;
width: 1px;
height: 1px;
margin: -1px;
padding: 0;
overflow: hidden;
clip: rect (0,0,0,0);
border: 0;
}
```

Non-Descriptive Links to External Destinations (AAA)

Link elements are present that direct users to third party webpages without informing the user.

WCAG Reference:
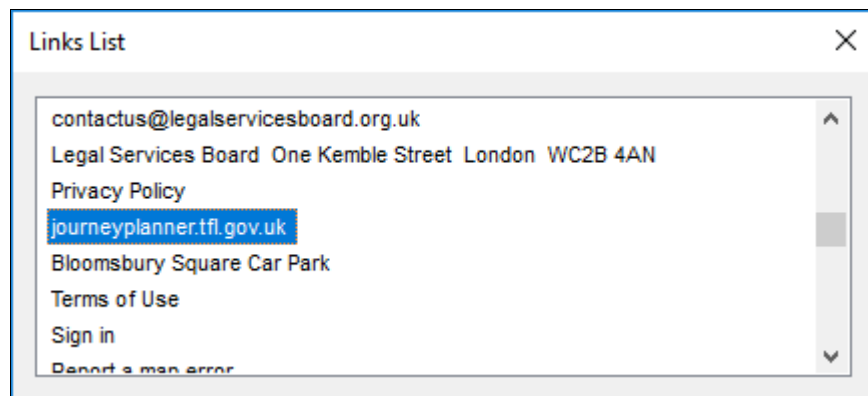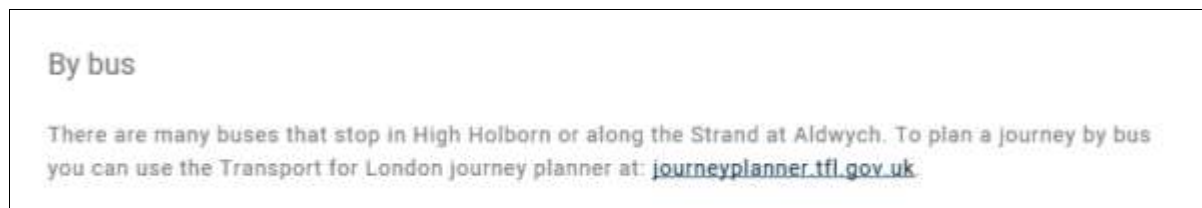2.4.9 Link Purpose (Link Only)
Understanding Link Purpose (Link Only) | How to Meet Link Purpose (Link Only)
(Level AAA)

Issue ID: DAC_Non-Descriptive_Links_to_External_Destinations_Issue1

Page: Contact us | The Legal Services Board
URL: https://dev.union10.co.uk/lsb/enquiries/contact-us

Screen Shot:

The 'journeyplanner.tfi.gov.uk' link requires link text that is descriptive enough for screen reader users to understand when navigating out of context and identify that the link directs users to an external website.

Current Code Ref(s):

```
<p>There are many buses that stop in High Holborn or along the Strand at Aldwych.
To plan a journey by bus you can use the Transport for London journey planner
at: <a
href="http://journeyplanner.tfl.gov.uk/">journeyplanner.tfl.gov.uk</a>.</p>
```

Screen reader comments:

"The URL related to the journey planner requires descriptive link text for users navigating out of context, such as 'Plan a journey'. This will ensure that all users are fully aware of the purpose of the link."

Solution:

Ensure that link text is descriptive to help users identify the links destination or purpose when navigating out of context. Links to external destinations can be easily identified by including additional link text such as "external website". For example:

```
<p>There are many buses that stop in High Holborn or along the Strand at Aldwych.
To plan a journey by bus you can use the
<a href="http://journeyplanner.tfl.gov.uk/">Transport for London journey planner
(External website)</a>.</p>
```

Duplicate Image Link Text (Usability)

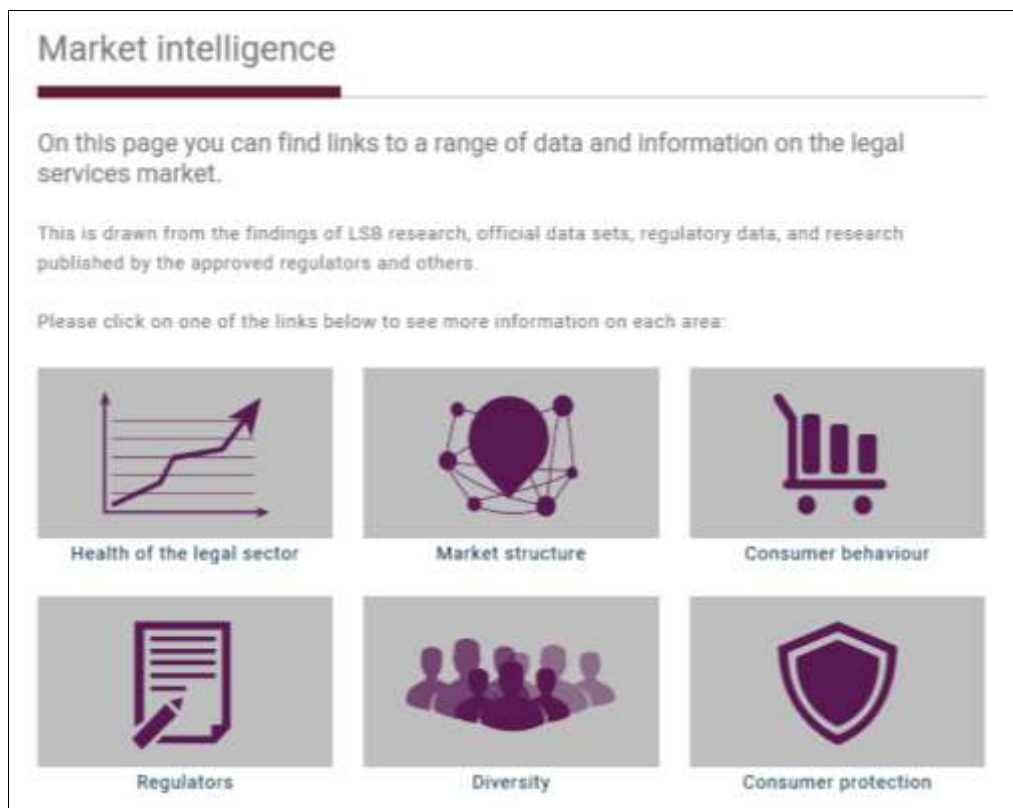Image links contain duplicate text.

WCAG Reference:

N/A – Usability Feedback

Issue ID: DAC_Duplicate_Image_Link_Text_Issue1

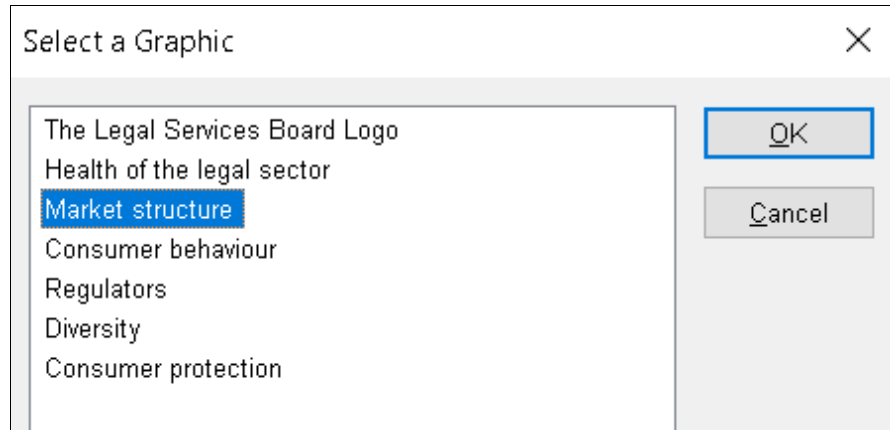Page: Market intelligence | The Legal Services Board
URL: https://dev.union10.co.uk/lsb/research/market-intelligence

Screen Shot:

The image links under 'Market intelligence' contain title attributes that duplicate the link text. This means that users of some assistive technology may hear the image link announced twice which could cause some confusion.

Current Code Ref(s):

```
<a class="col-alt col-4-alt max-width-image  bot-med-marg flex-cta-image-block"
href="https://dev.union10.co.uk/lsb/research/market-intelligence/health-of-the-
legal-sector">

<img class="  lazyloaded" src="https://dev.union10.co.uk/lsb/wp-
content/uploads/2019/05/Health-of-the-legal-sector.png" data-
src="https://dev.union10.co.uk/lsb/wp-content/uploads/2019/05/Health-of-the-
legal-sector.png" alt="" title="Health of the legal sector">

<figcaption>
<p class="no-bot-marg small-top-pad line-height-one">Health of the legal
sector</p>
</figcaption>

</a>
```

Screen reader comments:

"There are graphics such as 'market structure', that duplicate the following link text. I would therefore find it helpful if these graphics were made invisible to screen reader users as the information, they contain is already present on the page."

Solution:

Ensure that the image links title attributes do not duplicate the link text in order to prevent this from being announced twice by screen reader software.

DAC | Accessibility Report

Italic Text (Usability)

Some passages of italic text are present that may be difficult to read for some users.

WCAG Reference:
N/A – Usability Feedback

Issue ID: DAC_Italic_text_Issue1

Page: Closed applications | The Legal Services Board
URL: https://dev.union10.co.uk/lsb/our-work/statutory-decision-making/alterations-to-regulatory-arrangements/closed-applications

Screen Shot:

Some passages of test are emphasized by italics which some users can find difficult to read.

Current Code Ref(s):

```
<p><em><b>We advise applicants that it is their responsibility to explicitly tell
the LSB whether any information contained within the application is sensitive,
and should therefore not be published.</b></em></p>
```

Page: Legal Services | The Legal Services Board
URL: https://dev.union10.co.uk/lsb/news/legal-services-board-publishes-its-2019-regulatory-performance-report

Screen Shot:

"We have seen significant ongoing improvement in the performance of the regulators since we first started assessing them in 2011. I am pleased that in this latest assessment, the first under our new framework, we have again found considerable progress from our previous assessment in 2017. Whilst this progress is encouraging, there is still work to be done by every regulatory body and the LSB will be pressing each body to strive for continuous improvement, demonstrating that they are well-led organisations.

Some passages of test are emphasized by italics which some users can find difficult to read.

Current Code Ref(s):

```
<p><span style="color: #000000;"><em>"We have seen significant ongoing
improvement in the performance of the regulators since we first started assessing
them in 2011. I am pleased that in this latest assessment, the first under our
new framework, we have again found considerable progress from our previous
assessment in 2017. Whilst this progress is encouraging, there is still work to
be done by every regulatory body and the LSB will be pressing each body to strive
for continuous improvement, demonstrating that they are well-led
organisations.  </em></span></p>
```

```
<p><span style="color: #000000;"><em>There are two particular areas where a
considerable number of regulatory bodies have not yet met the minimum standards
required and we will focus our attention on these areas in the coming year. The
first relates to failure of some regulators to include disciplinary findings in
their regulatory registers. The second concerns transparency about regulators'
decision making and performance, which includes issues such as publishing Board
papers and detailed minutes".  </em></span></p>
```

Solution:

We strongly suggest maintaining a clear and consistent font style throughout for ease of reading.

SVG Images Receive Focus (Usability)

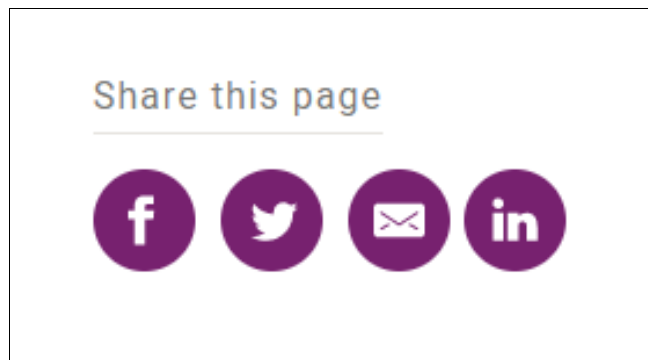SVG images are receiving keyboard focus.

WCAG Reference:

N/A – Usability Feedback

Issue ID: DAC_SVG_Images_Receive_Focus_Issue1

Page: Legal Services Board publishes its 2019 regulatory performance report | The Legal Services Board
URL: https://dev.union10.co.uk/lsb/news/legal-services-board-publishes-its-2019-regulatory-performance-report

Screen Shot:

The social media icons under 'Share this page' contain SVG images that receive keyboard focus when browsing in Internet Explorer 11. This however is not indicated by a visible focus indicator and can be disorientating for keyboard only users because they may not be able to determine where their focus is on the page.

Current Code Ref(s):

```
<div class="resp-sharing-button resp-sharing-button--facebook resp-sharing-
button--small">
<div aria-hidden="true" class="resp-sharing-button__icon resp-sharing-
button__icon--solid">
<svg xmlns="https://www.w3.org/2000/svg" viewBox="0 0 24 24">
<path d="M18.77 7.46H14.5v-1.9c0-.9.6-1.1 1-1.1h3V.5h-4.33C10.24.5 9.5 3.44 9.5
5.32v2.15h-3v4h3v12h5v-12h3.85l.42-4z"></path>
</svg>
</div>
</div>
```

Keyboard only comments:

"While on the 'News' page the link highlighting is visible on the links but when tabbing through the user has to tab twice before getting to the next link, but when the link highlighting disappears the user can still access the relevant link."

Solution:

Consider adding the attribute focusable="false" to each SVG image to ensure they do not receive focus when navigating in Internet Explorer.

End of Report

The Process

The website is measured against the Web Accessibility Initiative's (WAI) Web Content Accessibility Guidelines 2.1 (WCAG 2.1) to give an accurate feedback on any non-compliant issues. To attain our standard accreditation all A and AA criteria must be achieved.

To give a more accurate review of the website the DAC team employ two differing testing processes.

The first is a manual technical audit using automated tools and the second a dedicated team of user testers with differing disabilities test using a range of adaptive technologies. The findings of both testing teams are then combined to give the client far more accurate feedback on the website.

By using the testing team in conjunction with an automated procedure a more accurate set of results are made available.

This report combines technical auditing with disabled user feedback. The test does not list each specific area that requires change but highlights patterns of problems where they exist. Each section of the report includes a qualifying statement of pass, fail or recommendation to help developers quickly identify which parts of the website need the most urgent attention.

CRITERIA

Pass

This means that for this section of the report, the website meets the expectations of the testing team and that there were no major issues encountered that would significantly affect their browsing experience.

Fail

Websites that have one or more issues will have a fail flagged for that section. There will be a list of actions that the developers need to address to make sure that the website meets the expectations of the DAC testing team.

Not Applicable

The technology or criteria measured against is not present on the website.

DAC Testing Procedure

The website is tested by a team of experienced auditors, many of who are disabled individuals and users of adaptive technology. The combination of subjective pan-disability user feedback and comprehensive technical auditing allows us to measure how the website performs technically and practically, thereby offering an essential added dimension to our test results that other methods of testing cannot provide.

User Testing

Manual accessibility checking was conducted by a team of disabled individuals, using a range of adaptive technologies (hardware and software designed to facilitate the use of computers by people with disabilities). This may include:

NVDA: a screen reader and application used by those who are blind.

ZoomText: a magnification application used by those with low vision.

JAWS: a screen reader used by blind people to access pages.

Dragon Naturally Speaking: voice activated software used by those that do not use a conventional input device such as a keyboard or mouse.

Switch Access: used by those with severe mobility impairments to input commands to a computer.

Keyboard Only: some users with mobility impairments have difficulty making precise movements required by pointing devices such as a mouse; therefore, a keyboard is used as the exclusive input device.

Readability: Manual checks were made to assess the suitability of a page for those with colour blindness and dyslexia.

Deaf/Hard of hearing: Manual checks were made to assess the suitability of a page for those with hearing impairments.

Learning difficulties: Manual checks were made to assess the suitability of a page for those with learning difficulties.

Technical Auditing

Technical auditing involves the experienced application of a number of technical auditing and standards compliance assessment tools. This combined with an extensive knowledge of WCAG, its application and wider global practice provides the DAC website with further credibility and quality.