



Ministry  
of Digital Transformation  
of Ukraine

DIA Support Project

 Sweden  
Sverige



# Web Accessibility of Government Authorities' Websites

Report on monitoring results  
for 2025

The monitoring was conducted within the framework of [Digital, Inclusive, Accessible: Support to Digitalisation of Public Services in Ukraine](#) project (DIA Support Project), implemented by the United Nations Development Programme (UNDP) in Ukraine with the support of Sweden, in partnership with the Ministry of Digital Transformation of Ukraine. The views, comments, conclusions or recommendations in this document are those of the authors and do not necessarily reflect the views of UNDP in Ukraine, the Government of Sweden and/or the Ministry of Digital Transformation of Ukraine.

**The author of the monitoring methodology** is Dmytro Popov, Digital Accessibility Specialist of the UNDP in Ukraine DIA Support Project, Director of Digital Accessibility Laboratory LLC, and Web Accessibility Specialist certified by the International Association of Accessibility Professionals (IAAP WAS).

The audit was conducted jointly with the Digital Accessibility Competence Centre, established under the Diia state enterprise.

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# Introduction

This report summarises the results of the fifth annual accessibility monitoring of 100 government websites, conducted to assess the level of digital accessibility of official web resources and to formulate recommendations for addressing revealed violations and improving practices of ensuring a barrier-free access to information and electronic services.

The monitoring was conducted using the methodology developed in 2021 at the request of the UNDP in Ukraine. The methodology is based on the principles of the Web Content Accessibility Guidelines (WCAG) 2.1, and includes detailed guidelines enabling government authorities to independently assess their websites' compliance with accessibility requirements. In 2025, the methodology was expanded in response to the need for broader practical application: enhanced assessment procedures were introduced for web resources that had achieved a high level of basic accessibility, along with assessment criteria for mobile applications. The full updated methodology is provided in Appendix 2.

Since 2021, UNDP in Ukraine, in partnership with the Ministry of Digital Transformation of Ukraine and with the support of the Government of Sweden, has implemented a series of initiatives aimed at enhancing digital accessibility in Ukraine. As part of these efforts, the national standard DSTU EN 301 549:2022 was adopted, aligning European accessibility requirements with the Ukrainian legal framework; an official Ukrainian translation of WCAG 2.1 was developed; the official Ukrainian translation of the WCAG 2.1 Guidelines was developed; the educational series "Web Accessibility" was produced for the Diia.Education platform; and the "Quick Guide to Web Accessibility" was published. In addition, a number of sociological and analytical studies were conducted in cooperation with partners, the findings of which formed the basis for determining the priority areas of public policy to ensure the rights of persons with disabilities to equal access to digital resources and services. All related materials are available on the [Diia.Barrier-Free](#) platform.

In 2025, the monitoring of accessibility of government websites was conducted for the second time jointly with the Digital Accessibility Competence Centre (hereinafter – the Competence Centre) operating under the Diia state enterprise. This collaboration improved the efficiency of the assessment process, reduced the time required to process the results, and ensured a more coordinated approach to data analysis.

In the same year, the website builder used to create official websites of government authorities was modernised. This platform currently supports approximately 40 websites of central and local executive authorities, including the Government Portal. The modernisation aimed to improve technical accessibility parameters in line with WCAG 2.1 requirements, thereby contributing to an increased level of accessibility across all web resources operating on this content management system.

Throughout 2025, with the support of UNDP and the Government of Sweden, systematic efforts continued to raise awareness among civil servants in the field of digital accessibility. In cooperation with the Competence Centre, a series of training activities on creating accessible web content was conducted for civil servants. Nearly 2,000 participants took part in these activities during the year, significantly strengthening institutional capacity to ensure accessibility of digital services and resources.

The results of this year's monitoring, as compared to previous years, demonstrate significant progress by government authorities in complying with accessibility requirements. At the same time, certain systemic shortcomings persist, which confirms the need for further improvement of control mechanisms, the introduction of comprehensive measures to enhance the quality of policy implementation in the field of digital accessibility, and the expansion of information and educational programmes to ensure a sustainable approach to building an inclusive digital environment.

# Summary of the monitoring

The monitoring of government websites' accessibility was conducted in two stages — a basic assessment and an in-depth assessment — between 1 September and 31 December 2025. Within the scope of the study, **100 official websites were assessed** according to the basic methodology, which covers 10 accessibility components. In addition, for the first time, an in-depth assessment of **5 websites** was conducted against 50 success criteria of the Web Content Accessibility Guidelines (WCAG) 2.1. Furthermore, the monitoring also included, for the first time, an assessment of the accessibility of **5 mobile applications**, which were also assessed against ten basic components.

In 2025, certain adjustments were made to the sample composition: 8 out of the 100 websites were replaced due to the reorganisation of several ministries, the discontinuation of some websites, or their loss of relevance. Accordingly, the dynamics of the indicators were analysed for 92 websites that have been monitored consistently for more than one year.

The results of the basic assessment of 100 websites demonstrate significant positive progress compared to the previous year. **The number of websites achieving a high level of basic accessibility increased from 7 in 2024 to 29 in 2025, while those with a sufficient level rose from 17 to 23.** As a result, 52% of the assessed websites now demonstrate either a sufficient or high level of basic accessibility. Correspondingly, the number of websites with low and medium levels of accessibility has decreased, indicating an overall positive trend in the implementation of digital accessibility principles.

The in-depth assessment of websites was conducted for the first time; therefore, no comparative data from previous years is available. This stage of the study was not aimed at producing quantitative indicators, but rather at identifying typical and systemic accessibility barriers that are not captured during basic assessment. In particular, the 2025 results showed that editors often fail to add alternative texts to images, and that complex interactive interface elements may be inaccessible to keyboard users or users of screen readers.

The assessment of mobile applications identified similar issues to those observed on websites, including insufficient colour contrast and inconsistent labelling of interface elements.

# Section 1.

## Basic assessment of 100 websites

### Dynamics of key indicators for 2024-2025

A comparison of accessibility monitoring results for 92 websites assessed for more than 1 year shows noticeable progress. In particular:

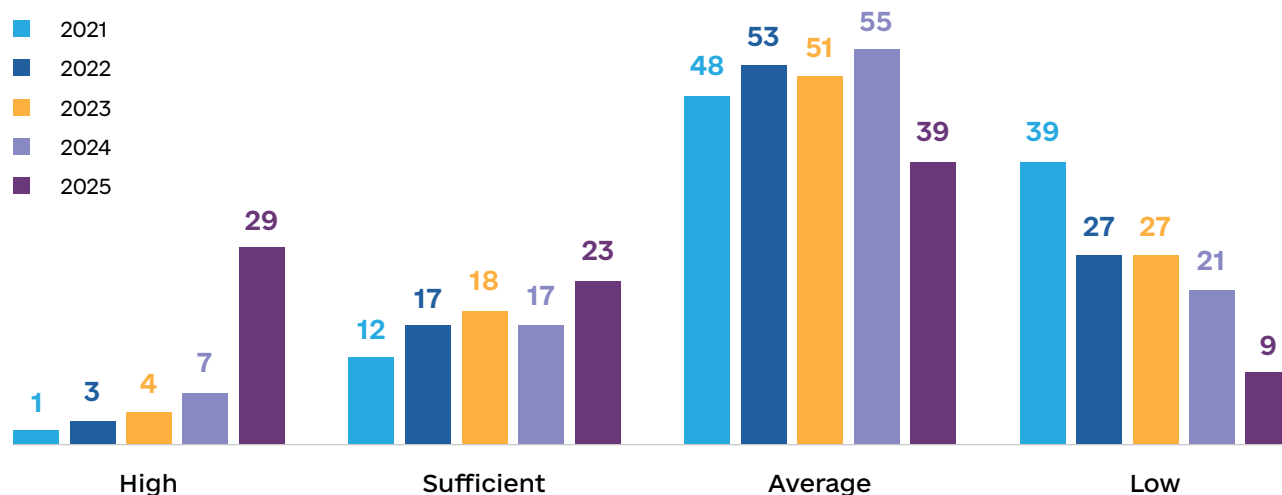
- 43 websites (46.7%) improved their performance;
- 42 websites (45.7%) maintained their previous rating;
- 7 websites (7.6%) showed a slight decline.

Among the websites that improved their performance, 1 website increased its score by 8 points, 4 – by 7 points, 4 – by 6 points, 5 – by 5 points, 4 – by 4 points, 3 – by 3 points, 7 – by 2 points, and 15 – by 1 point. Among the websites with negative dynamics, 1 decreased its score by 2 points, and 6 – by 1 point.

Overall, the number of websites showing positive progress exceeds those with negative trends by more than six times, and the maximum improvement (+8 points) is four times greater than the maximum decline (–2 points). This confirms an overall upward trend in the accessibility of official government web resources.

Over the five-year period, a consistent improvement in the level of basic accessibility of web resources has been observed. Particularly noteworthy is the leap in 2025: the number of websites with a high level of accessibility increased to 29, which is almost four times higher than in the previous year (7 in 2024). This demonstrates significant progress in the implementation of digital accessibility standards.

**Chart 1.** Distribution of websites by basic accessibility levels



In 2025, a significant increase was recorded in the number of websites achieving a high level of basic accessibility (29 compared to 7 in 2024), demonstrating the effectiveness of the monitoring, training, and standards compliance measures implemented. At the same time, websites with an average level of accessibility continue to constitute the largest share of the sample (39%), indicating the need for further efforts to stimulate qualitative improvements. This underscores the importance of strategic planning, including strengthened technical support, the introduction of certification mechanisms, and targeted assistance to institutions that have not yet reached an adequate level of accessibility.

## Distribution of websites by basic accessibility levels

Over the past year, the share of websites with high (9-10 points) and sufficient (7-8 points) basic accessibility levels has increased significantly. While in 2024 only 7% of websites demonstrated a high level of accessibility, and only three websites achieved the maximum score of 10 points, in 2025 high level was achieved by 29% of websites, 16 of which received the maximum score. The number of websites with a sufficient accessibility level also increased, from 17 to 23. As a result, the total share of websites demonstrating a sufficient or high accessibility level reached 52%.

At the same time, in 2025 a share of websites with average and low accessibility levels decreased as compared to 2024 by 16 and 12 percentage points, respectively.

**Table 1.** Dynamics of distribution of websites by basic accessibility levels, 2024-2025

Level	2025	2024	Dynamics
High	29	7	+22
Sufficient	23	17	+6
Average	39	55	-16
Low	9	21	-12

## Top performers in basic accessibility

As noted above, in 2025, a high level of basic accessibility (9-10 points) was demonstrated by 29 websites, 16 of which achieved the maximum score. Below is the list of websites that received 10 points:

- Ministry of Digital Transformation of Ukraine (<https://thedigital.gov.ua>);
- Ministry for Communities, Territories and Infrastructure Development of Ukraine (<https://mindev.gov.ua>);
- Ministry of Youth and Sports of Ukraine (<https://mms.gov.ua>);
- Ministry of Education and Science of Ukraine (<https://mon.gov.ua>);
- Unified State Services Portal Diia (<https://diia.gov.ua>);
- Diia.Barrier-Free (<https://bf.diia.gov.ua>);

- Diia.City (<https://city.diia.gov.ua>);
- Electronic Services Portal of the Pension Fund of Ukraine (<https://portal.pfu.gov.ua>);
- Unified Web Portal of Spending Public Funds (<https://spending.gov.ua>);
- National Police of Ukraine (<https://www.npu.gov.ua>);
- National Social Service of Ukraine (<https://nssu.gov.ua>);
- Zakarpattia Regional State Administration (<https://carpathia.gov.ua>);
- Ivano-Frankivsk Regional State Administration (<https://www.if.gov.ua>);
- Luhansk Regional State Administration (<https://lova.gov.ua>);
- Lviv Regional State Administration (<https://loda.gov.ua>);
- Rivne Regional State Administration (<https://www.rv.gov.ua>).

## Websites with the greatest progress

The websites listed below demonstrated the greatest progress in accessibility in 2025.

**Table 2.** Websites with the greatest accessibility progress in 2025

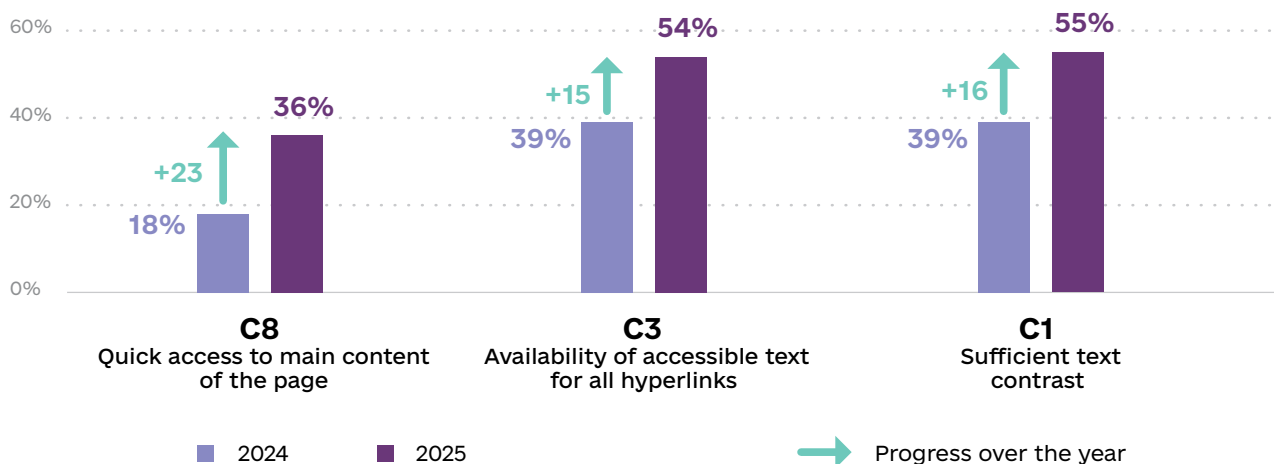
Website	Link	Progress level	Total score
Rivne Regional State Administration	<a href="https://www.rv.gov.ua">https://www.rv.gov.ua</a>	+8	10
Zakarpattia Regional State Administration	<a href="https://carpathia.gov.ua">https://carpathia.gov.ua</a>	+7	10
Ivano-Frankivsk Regional State Administration	<a href="https://www.if.gov.ua">https://www.if.gov.ua</a>	+7	10
Donetsk Regional State Administration	<a href="http://dn.gov.ua">http://dn.gov.ua</a>	+7	9
Ternopil Regional State Administration	<a href="https://oda.te.gov.ua">https://oda.te.gov.ua</a>	+7	9

## Analysis of the achievement of basic accessibility components

According to the results of the 2025 monitoring, only one component was achieved by fewer than half of the websites. This is **C8 “Quick access to main content of the page”** (36%). However, this figure is twice as high as in 2024. The other components were achieved within the range of 54-88%.

Among the components with the lowest level of achievement are also **C3 “Availability of accessible text for all hyperlinks”** (54%) and **C1 “Sufficient text contrast”** (55%).

**Chart 2.** Components with the lowest level of achievement in 2025



The highest achievement levels were recorded in the following components:

- **C5 “Availability of text labels for form fields”** — 88%;
- **C6 “Software determination of main language of the page”** — 79%;
- **C4 “Availability of text labels for all buttons”** — 76%.

The most significant increase in 2025 was observed for **C9 “Keyboard focus marking”** (+24 percentage points), while the smallest increase was recorded for **C5 “Availability of text labels for form fields”** (+3 percentage points); nevertheless, the latter continues to maintain a leading position overall.

As evidenced by the 2021–2025 trend, the greatest overall progress was observed for C6 (+40 percentage points) and C1 (+39 percentage points), while the least improvement was recorded for **C10 “Support for keyboard control”** (+8 percentage points). No negative dynamics were recorded for any component.

**Chart 3.** Components with the greatest progress of all time

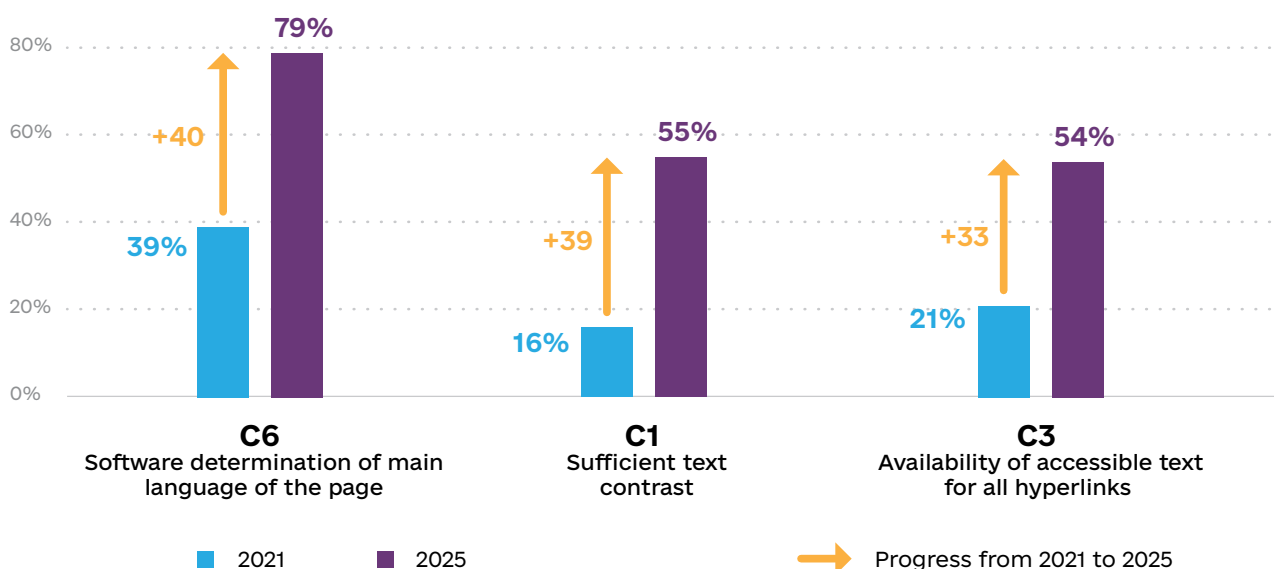
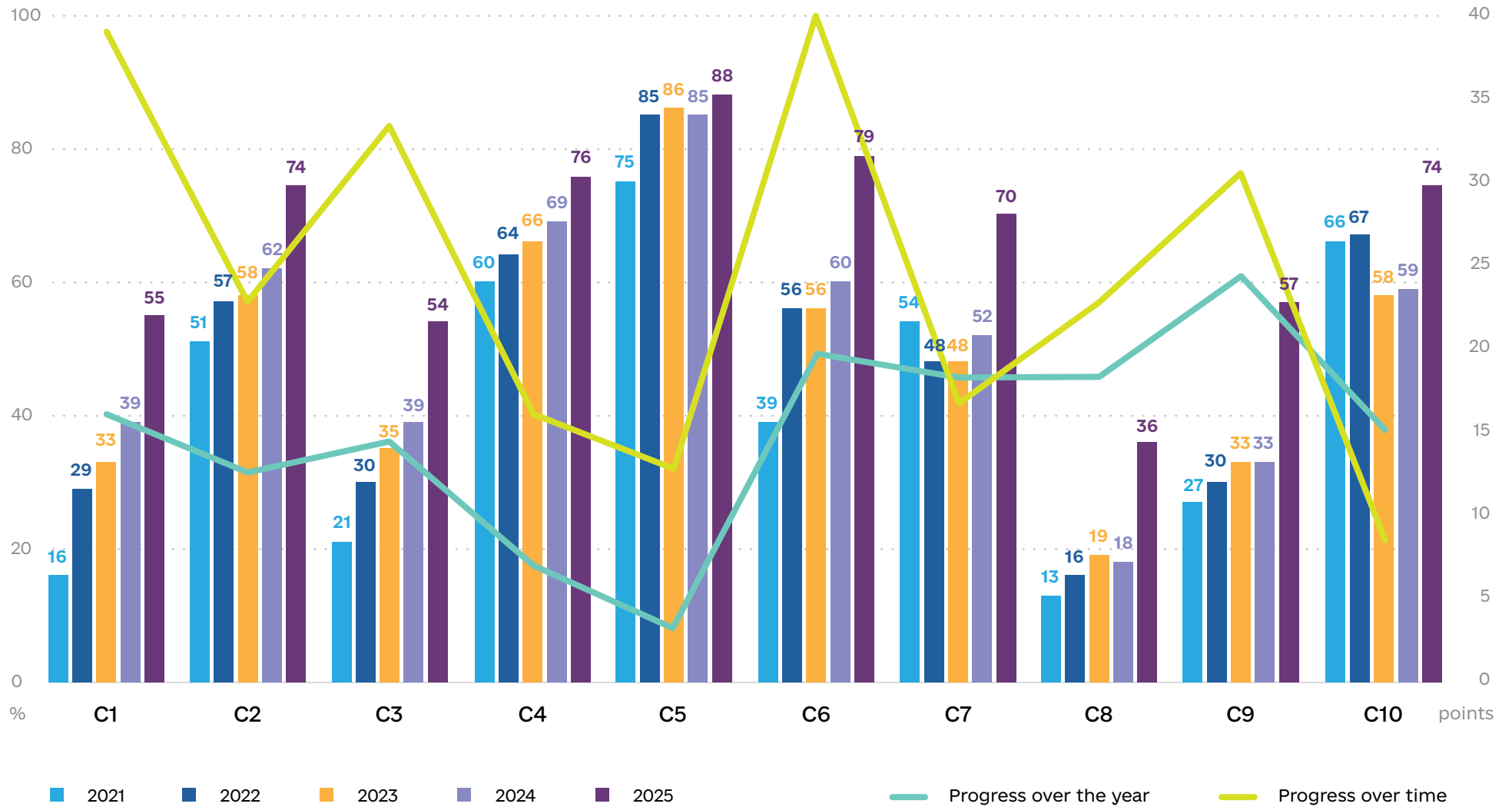


Table 2 presents the values of all components across the 5 years of the study.

**Table 3.** Dynamics of component achievement, 2021-2025

Component	2025	2024	2023	2022	2021	Progress over the year	Progress over time
C1. Sufficient text contrast	55	39	33	29	16	16	39
C2. Availability of alternative text for all images	74	62	58	57	51	12	23
C3. Availability of accessible text for all hyperlinks	54	39	35	30	21	15	33
C4. Availability of text labels for all buttons	76	69	66	64	60	7	16
C5. Availability of text labels for form fields	88	85	86	85	75	3	13
C6. Software determination of main language of the page	79	60	56	56	39	19	40
C7. Lack of errors in the page code	70	52	48	48	54	18	16
C8. Quick access to main content of the page	36	18	19	16	13	18	23
C9. Keyboard focus marking	57	33	33	30	27	24	30
C10. Support for keyboard control	74	59	58	67	66	15	8

**Chart 4. Dynamics of component achievement, 2021-2025**



## Common accessibility errors

As in previous years, the most common violations leading to failure to achieve the components remain the following:

- 1. Lack of quick access to main content of the page (Component 8).** In most cases, the link is either missing, not functioning, or placed not first in the focus.
- 2. Insufficient contrast between text and background (Component 1), which complicates information perception for visually impaired users.** According to WCAG, contrast should be at least 4.5:1 for regular text and 3:1 for large or bold text.
- 3. Links without descriptive names (Component 3).** The problem arises when links are presented as icons or banners without text support. In such cases, the aria-label attribute should be used to provide a clear text alternative (e.g., "Facebook Page").
- 4. Non-descriptive or duplicate alternative text for images (Component 2).** Although 74% of websites contain alternative text, it is often of low quality, duplicating headings or failing to convey the actual meaning of the image.
- 5. Limited accessibility of keyboard navigation (Component 10), primarily affecting menus that open only on mouse hover.** Some keyboard navigation barriers identified during the in-depth assessment are described in more detail in Section 2.

# Section 2.

## In-depth assessment of five websites

According to the updated methodology, five resources (5% of the total number assessed) were selected for in-depth assessment from among those that received the maximum score. Websites created using the SCMU website builder were excluded from this list, as the builder underwent comprehensive testing following its modernisation in 2025. Accordingly, the following websites were selected for in-depth assessment:

- the website of the Ministry of Digital Transformation of Ukraine;
- the Unified State Services Portal Diia;
- the Electronic Services Portal of the Pension Fund of Ukraine;
- the website of the Ministry for Communities, Territories and Infrastructure Development of Ukraine;
- the website of the Ministry of Education and Science of Ukraine.

The results of the in-depth assessment showed that all five websites either **partially or largely comply with the requirements of DSTU EN 301 549:2022 (WCAG 2.1, level AA)**. None of the websites demonstrated full compliance (100%); however, two achieved a high level of compliance (90-99%), while three demonstrated partial compliance (70-89%).

The audit did not reveal any resources failing to comply with the DSTU requirements (i.e. below 70%), which confirms the high score received during baseline assessment (10 points) and indicates systematic efforts undertaken by website administrators to improve accessibility. At the same time, these findings also underline the need to address recurring errors in the structure, semantics, and interface adaptability.

**Table 3.** Level of website compliance with the requirements of DSTU EN 301 549:2022 (WCAG 2.1 AA)

Compliance level	Number of websites	Share (%)
Non-compliance (<70%)	0	0
Partial compliance (70–89%)	3	60
High compliance (90–99%)	2	40
Full compliance (100%)	0	0

## WCAG 2.1 Level AA criteria most frequently violated

The analysis of five websites against the requirements of WCAG 2.1 Levels A and AA revealed that a number of criteria were not met on some or all of the assessed resources. In total, 19 out of 50 criteria were violated by at least one website, and 9 of these were violated by two or more websites (see Table 4). The most frequent non-compliance relates to fundamental accessibility requirements, including the provision of appropriate alternatives for non-text content (Criterion 1.1.1), the correct identification of role and state for interactive elements (Criterion 4.1.2), and the structural consistency of content (Criterion 1.3.1). Such shortcomings were identified across the majority of websites assessed under the in-depth methodology, indicating systemic challenges in the creation of alternative content formats, as well as in the implementation of interface components and semantic markup.

**Table 4.** WCAG 2.1 Level AA criteria most frequently violated

Criterion	Number of websites with violations	Typical manifestations
<b>1.1.1. Non-text content</b>	5	Missing or inadequate alternative texts for images
<b>4.1.2. Name, role, value</b>	4	Incompatibility of dropdown lists and accordions with screen readers
<b>1.3.1. Information and relationships</b>	3	Incorrect heading structure; regular text marked up as heading
<b>1.4.10. Scrolling in multiple directions</b>	3	Elements disappear or overlap on narrow screens
<b>2.4.6. Headings and labels</b>	3	Incorrect or excessive ARIA labels; duplicated element names
<b>2.1.1. Keyboard</b>	3	Inability to move focus; problems with expanding menus
<b>1.4.4. Resizing text</b>	3	Parts of text or interface elements disappear or overlap when zooming in
<b>1.4.3. Contrast (minimum requirements)</b>	2	Insufficient contrast between text and background
<b>2.4.7. Visible focus</b>	2	Keyboard focus indicator not visible on some buttons and other interactive elements
<b>1.4.1. Use of colour</b>	1	Text links are not highlighted
<b>1.3.2. Meaningful sequence</b>	1	Chat link is placed at the bottom of the page (DOM)

Criterion	Number of websites with violations	Typical manifestations
<b>1.4.11. Contrast of non-text elements</b>	1	Selected tab is not highlighted with a contrasting colour
<b>1.4.12. Line spacing</b>	1	Setting regular intervals causes content loss
<b>1.4.13. Content on hover or focus</b>	1	Pop-up tips violate WCAG requirements
<b>2.4.2. Page title</b>	1	All pages have the same meta titles
<b>2.5.3. Label in the element name</b>	1	Visible label text does not match the programmatically determined element name (poor screen reader compatibility)
<b>3.3.1. Error identification</b>	1	Notifications of errors do not explain what needs to be fixed
<b>3.3.2. Labels or instructions</b>	1	Input field has no label
<b>4.1.3. Notifications of status</b>	1	Information about the number of search results is not announced when updated

## Typical errors and ways to fix them

Based on the analysis of the revealed problems, a list of typical errors causing non-compliance with standards was compiled.

The barriers listed below were identified on more than one website:

- 1. Missing or poor-quality alternative text for images (Criterion 1.1.1).** In most cases, illustrations published on news pages or in informational sections either lack text descriptions or use alternative text that merely duplicates headings without conveying the image's meaning. It is recommended that when publishing content, every informative image be provided with a concise and meaningful alternative text, while decorative images should use empty alt="" attribute.
- 2. Incorrect heading structure and logical content sequence (Criterion 1.3.1).** On some pages, inconsistencies were found between visual styling and semantic markup: text fragments are labelled as headings without logical justification or, conversely, headings are not labelled with <h1>–<h6> tags. It is recommended to follow a clear heading hierarchy and structure content according to its meaning, which will improve navigation for users of assistive technologies.

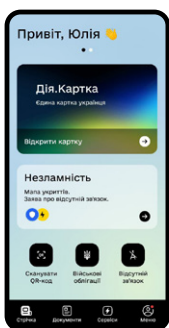
- 3. Undefined roles and states of interactive elements (Criterion 4.1.2).** Menus, buttons, and dropdown lists lack attributes that define element roles and states, preventing screen readers from notifying the user of changes during interaction. It is recommended to add necessary ARIA attributes and ensure their values are dynamically updated when the element state changes.
- 4. Content disappearing or being clipped when the page is zoomed in (Criteria 1.4.4 and 1.4.10).** When viewed on mobile devices or when zoomed in, some interface elements disappear or overlap with others. It is recommended to implement responsive design using flexible layouts, avoid fixed sizes, and ensure that content remains accessible at any zoom level.
- 5. Incorrect or redundant element labels (Criteria 2.4.6, 2.5.3).** Some buttons and links have duplicated or technical labels, such as “button” or “link”, that do not add meaning and make perception more difficult. In addition, incorrect use of the aria-label attribute was identified: it overrides the existing button text. It is recommended to use short, clear and unique labels that accurately describe the element’s action. Do not add aria-label to buttons or links that already contain inner text. It should be remembered that aria-label overrides inner text; therefore, when it is used, it must contain full descriptive text rather than a supplement to the inner text of an element.
- 6. Limited keyboard accessibility (Criteria 2.1.1, 2.4.7).** Some interactive elements, such as dropdown lists and chat launch buttons, cannot be focused using a keyboard, making them unusable without a mouse. In addition, some interactive elements (e.g. buttons) lack visible keyboard focus indicators, so users cannot determine which element is currently focused. It is recommended to ensure that all interactive elements are keyboard-focusable, provide a clearly visible focus indicator, and test navigation using Tab and Shift+Tab keys on all pages.
- 7. Non-unique page titles (Criterion 2.4.2).** On one of the websites, all pages have the same meta titles (<title> tag content), which complicates identification during navigation. It is recommended to ensure page titles are unique and include both the section name and the resource name, for example: “Services – Electronic Services Portal”.

# Section 3.

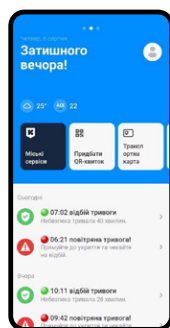
## Assessment of mobile applications

In 2025, the accessibility of mobile applications providing online services was assessed for the first time. In total, five applications were examined: three in the field of public services, one municipal application, and one private application for the provision of medical services.

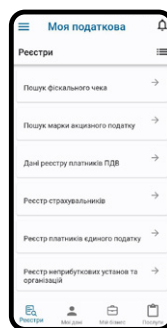
The following mobile applications were selected for assessment:



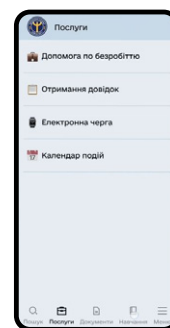
**Diia**



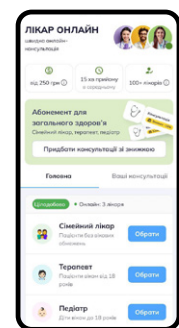
**Kyiv Digital**



**My Tax Service**



**State Employment Service**



**HELSI**

Two versions of each mobile application were assessed – for iOS and Android. Consequently, a total of 10 resources were evaluated.

Accessibility was examined through visual inspection of application screens, testing with assistive technologies of the respective platforms, in particular TalkBack on Android and VoiceOver on iOS, as well as analysis of screenshots using specialised tools to assess colour contrast and other visual characteristics of the interface.

## Distribution of mobile applications by basic accessibility levels

According to the monitoring results, only 20% of the assessed resources achieved a high accessibility level, receiving 9 points each (no resource was awarded the maximum score of 10). The majority of resources (60%) demonstrated either a sufficient or average accessibility level, meaning that barriers were identified which hinder the full use of services by all categories of users. A low accessibility level (3 points) was recorded for 20% of the assessed application versions.

The overall distribution of resources by basic accessibility level is presented in the table below.

**Table 5.** Distribution of mobile application versions by accessibility level

Accessibility level	Score	Number of applications (versions)
High	9–10	2
Sufficient	7–8	3
Average	4–6	3
Low	0–3	2

## Analysis of the achievement of accessibility components in mobile applications

Mobile applications most frequently failed to achieve the following components:

- **Component 1 (Sufficient text contrast).** Only 3 out of 10 instances met the requirements (ratio of at least 4.5:1).
- **Component 5 (Availability of accessible states).** In 6 out of 10 resources, assistive technologies did not announce element states (for example, which tab is selected or whether a switch is activated).

By contrast, the highest levels of achievement were recorded for the following components:

- **Component 6 (Accessible labels for input fields).** All 10 assessed resources complied with this requirement.
- **Component 7 (Accessible notifications of successful actions or errors).** In all applications, assistive technologies had access both to notifications and information about their absence.

**Table 6.** Achievement of components in mobile applications

Component	Number of resources
1. Sufficient text contrast	3
2. Scaling support	6
3. Accessible names for all interactive elements	5
4. Accessible roles for all interactive elements	6
5. Accessible states for all interactive elements	4
6. Accessible labels for input fields	10
7. Accessible notifications of successful actions or errors	10
8. Correct focus order for assistive technologies	8
9. Ability to navigate using simple gestures	6
10. Programmatic determination of screen and section headings	5

## Typical errors and ways to fix them

The analysis revealed the following most common errors:

- **Critically low contrast.** Placeholder texts, element names, dates, and grey texts against a light background often have contrast ratios ranging from 1.3:1 to 3.9:1, as compared to the regular ratio of 4.5:1. To avoid contrast-related problems, it is recommended to review the interface colour palette and ensure that all text elements meet the minimum WCAG contrast requirements, including auxiliary and secondary text. For practical contrast checking, the [Accessibility Scanner](#) application should be used on Android, while on iOS, the universal [Colour Contrast Analyser](#) tool is recommended.
- **Lack of programmatically determined states, roles and names.** Some buttons lack labels (TalkBack announces them as “Unlabelled”), and interactive elements (tabs, checkboxes) do not have determined states or roles, which makes it difficult to understand how to interact with them (for example, screen reader does not announce that an element is a checkbox, whether it is currently selected, or that an element represents an active tab). To avoid such problems, it is recommended that, at the implementation level, every interactive element be provided with a clear name, a programmatically determined role and state, so that assistive technologies can correctly convey the element type and its current state to the user (for example, “Profile, tab, selected”). It is important to emphasise that roles and states must always be determined programmatically rather than described verbally. To verify the correct determination of element names, roles and states, the platform screen reader should be used – VoiceOver on iOS and TalkBack on Android.
- **Scaling problems.** In a number of applications, text scaling is either not supported at all or causes content to be clipped. To prevent scaling problems, it is recommended to properly support system font size settings and test the interface in large-text modes, ensuring responsive layouts without loss of content.
- **Inaccessible navigation.** Instances were recorded where it was impossible to change the value of sliders, as well as where the “Back” buttons lacked focus when the screen reader was in use. To avoid navigation problems, it is recommended to verify the screen reader focus on all interactive elements and the ability to perform gestures with the screen reader enabled. It should be taken into account that screen readers modify the platform’s standard gestures. Information about basic gestures of VoiceOver and TalkBack screen readers can be found in the relevant software settings or help documentation.

According to the results of accessibility assessment of mobile applications, even in applications providing socially significant online services, digital accessibility issues are still not addressed sufficiently or systematically. Availability of some accessible solutions does not compensate for critical shortcomings related to contrast, navigation, and programmatic determination of interface elements. As a result, people with visual impairments and other user groups who rely on assistive technologies encounter significant barriers when using these applications.

# Conclusions

The results of the 2025 monitoring of the accessibility of government web resources indicate a significant improvement in overall compliance with basic accessibility requirements. During the year, government websites demonstrated progress in both quantitative and qualitative terms: the number of websites with a high level of basic accessibility increased more than four times, while the aggregate share of web resources with high and sufficient levels reached 52%. These outcomes point to systemic changes in approaches to the development and maintenance of government websites.

As the growth structure shows, a key role in this positive dynamics was played by the upgrade of the government website builder of the Secretariat of the Cabinet of Ministers of Ukraine, which provides templates that comply with most basic accessibility criteria. As a result, the indicators of a significant share of websites built on the updated website builder have improved. This confirms the effectiveness of a centralised technical approach to the implementation of accessibility standards, while at the same time highlighting the need for further systematic work by content editors.

For the first time, within the scope of the annual study, an in-depth assessment of five websites was conducted, making it possible to reveal systemic problems not fixed during the baseline monitoring. In particular, it was found that visually impaired users often encounter difficulties with keyboard navigation due to the inaccessibility of complex components, incorrect heading markup, and the absence of accessible text alternatives for images.

On the one hand, the results of the in-depth assessment confirmed the validity of high basic scores: all five websites assessed using the advanced methodology received scores ranging from 78% to 94%, which, according to the methodology, corresponds to high or partial compliance with DSTU EN 301 549. On the other hand, the findings highlighted the importance of conducting in-depth assessments, as they make it possible to reveal specific problems, particularly with complex components in forms on pages accessible only after user authentication, as well as with content that is regularly added to the websites.

In addition, for the first time, within the scope of the study, 10 mobile applications (five applications for two operating systems) were assessed. According to the assessment results, only 20% of resources achieved a high level of accessibility, while most exhibited the barriers related to low contrast, lack of accessible states, and absence of programmatically determined headings. This indicates the need to systematically integrate accessibility requirements at the design and development stages of mobile applications and to ensure that applications are included in the annual monitoring process.

Overall, the monitoring results confirm significant positive changes, while also demonstrating the need to move from the implementation stage to the stage of sustainable support for digital accessibility. The next logical step is the development of systems for regular internal monitoring, staff training, and the creation of methodological materials for content editors, which will ensure the sustainability of positive outcomes and guarantee a continuous improvement in the level of digital accessibility across the public sector.

# Recommendations

## General recommendations

### 1. Ensure systematic support for content accessibility

Owners and administrators of websites with a high level of basic accessibility are advised to focus their efforts on ensuring the accessibility of content. This includes introducing practices of adding alternative texts to images and monitoring the correct use of markup in articles (headings, tables, lists, etc.).

### 2. Improve the level of competence of content editors

It is recommended to continue providing regular training for staff responsible for website content. Professional development programs should cover the fundamentals of WCAG 2.1, typical content-related errors and ways to fix them, as well as the requirements for formatting text, media, and documents.

### 3. Modernise websites with low and average levels of accessibility

For websites demonstrating low or average results, it is necessary to develop technical modernisation plans that take into account the provisions of WCAG 2.1 and the national standard DSTU EN 301 549:2022. It is advisable to carry out periodic technical audits prior to updating content management systems and to introduce internal quality control mechanisms.

### 4. Introduce regular internal accessibility monitoring using the in-depth assessment method

Owners of all websites, including those that received the highest basic scores, should conduct in-depth accessibility audits. Baseline monitoring allows for rapid assessment of a large number of web resources, but does not replace comprehensive testing. When assessing an individual website, it is recommended to apply an in-depth assessment method that covers all key pages and makes it possible to reveal not only typical but also specific accessibility problems. The list of tests for in-depth assessment is provided in the updated methodology (Appendix 2).

### 5. Ensure the accessibility of mobile applications

Given the growing use of mobile government services, accessibility principles should be integrated throughout the entire application development lifecycle – from design to testing. It is essential to ensure full compatibility with screen-reading technologies and text enlargement features, as well as to provide sufficient interface contrast.

# Technical recommendations for addressing the causes of non-achievement of basic website accessibility components

Based on the analysis of errors that prevent the achievement of basic accessibility components, a set of technical recommendations to be taken into account during website modernisation has been developed.

**Note:** Achieving all 10 basic accessibility components does not equate to full compliance with DSTU EN 301 549:2022. To fully comply with this standard, a website must meet all applicable criteria related to web content and electronic documents.

## Recommendations for addressing the causes of non-achievement of Component 1 “Sufficient text contrast”

### Typical errors:

- the contrast of the additional information text is lower than 4.5:1;
- the contrast between the button’s fill and the text on it is less than 4.5:1.

### How to fix them:

- The text and background colours should be chosen in a way so that:
  - a) regular text had a contrast ratio of at least 4.5:1;
  - b) text in large Kegel font (18 points or 14 points, bold) had a contrast ratio of at least 3:1.

**Note:** The text that is a part of an inactive interface component, a part of the logo or brand name does not require contrast.

To measure the contrast of two colours, a special contrast checker tool can be used, for example: <https://webaim.org/resources/contrastchecker/>

## Recommendations for addressing the causes of non-achievement of Component 2 “Availability of alternative text for all images”

### Typical errors:

- news covers, illustrations in articles, and logos do not have alternative text;
- news covers have alternative text that matches the news heading;
- decorative images are not hidden from the screen reader by using an empty **alt** (**alt=""**);
- images contain stubs (e.g. **alt="img1"**) instead of proper alternative text.

### How to fix them:

- It is necessary to provide all images important for understanding the content with proper alternative text using the alt html-attribute or relevant field in the website’s administrative panel:
  - a) an example of proper alternative text for a logo: **alt="Diia Logo"**;
  - b) an example of alternative text for illustration: **“A group of six people, including a person in a wheelchair and a person with a white cane, stand together, hugging and smiling, demonstrating an atmosphere of support and inclusion”**.
- All decorative/non-informative images must be hidden from assistive technologies using empty alternative text (example: **alt=""**).

## Recommendations for addressing the causes of non-achievement of Component 3 “Availability of accessible text for all hyperlinks”

### Typical errors:

- social media links only contain social media icons, and no text label is provided;
- news or article covers are clickable, but do not have alternative text, meaning that the link containing the image does not have text for screen readers.

### How to fix them:

- Ensure that all hyperlinks have visible text or an image (such as an icon) associated with them.
- In cases where an image is used instead of text, make sure that the image is accompanied by appropriate alternative text.
- Make sure that the text of the link clearly explains its purpose.
- When it is not possible to add visible text to the link because an icon or text image is used, add the **aria-label** attribute (example: **aria-label=“Learn more about Diia project”**).

*Note: The aria-label attribute enables adding a text label that is not displayed visually, but is only accessible to screen readers used by visually impaired users.*

An example of appropriate text for a link to a social media page, added using the aria-label attribute: **aria-label=“Diia in Facebook (opens in new window)”**.

## Recommendations for addressing the causes of non-achievement of Component 4 “Availability of text labels for all buttons”

### Typical errors:

- the search button, form submission buttons, and buttons for displaying additional content are marked with a graphic icon without a text label for screen readers.

### How to fix them:

- Make sure that all buttons have a text label.
- In cases where an image (such as an icon) is used instead of a visible text label, make sure that the image is accompanied by appropriate alternative text.
- Make sure that the button's text label makes it clear what the button is for.
- When it is not possible to add a visible text label for the button or alternative text for the image associated with that button, add the **aria-label** attribute (example: **aria-label=“Login”**).

## Recommendations for addressing the causes of non-achievement of Component 5 “Availability of text labels for form fields”

### Typical errors:

- the field has no label;
- a **placeholder** attribute is used instead of a label;
- the label is located next to the field, but has no programmatic association with it.

### How to fix them:

- Ensure that all fields, checkboxes, radio buttons, and dropdown lists have a visible label that has a programmatic association with that field. To associate a label with a field, use the **<label>** tag with the **for** or **aria-labelledby** by attribute.

- Make sure that you do not use the **placeholder** attribute instead of the label, so that the label does not disappear after you enter information in the field. The placeholder attribute should only be used to demonstrate an example of data entry.
- Make sure that the label text makes it clear what the field is for.
- A search form that is marked in a certain way and has a button with a search icon (magnifying glass image) next to it does not necessarily have to have a visible label, but in this case, it is recommended to add a label to the search field for screen reader users using the **aria-label** attribute (example: **aria-label="Search"**).

## Recommendations for addressing the causes of non-achievement of Component 6 " Software determination of main language of the page"

### Typical errors:

- the page language is not specified;
- the language is specified incorrectly (for example, the English language attribute **"en"** is set for the Ukrainian language);
- wrong attribute is used (for example, **"ua"** instead of **"uk"** for the Ukrainian language).

### How to fix them:

- To establish the lang attribute for **<html>** element with the correct value:
  - a) on pages with Ukrainian language content, it is necessary to set the attribute **lang="uk"**.  
*Note: the "ua" value is incorrect;*
  - b) on pages with the English language content, it is necessary to set **lang="en"**.

## Recommendations for addressing the causes of non-achievement of Component 7 "Lack of errors in the page code"

### Typical errors:

- the same **id** value is used multiple times;
- the **aria-hidden="true"** attribute is used for focused elements;
- the **ARIA** attributes are used that are not supported for a specific element role (for example, **aria-expanded** for **role="tab"**);
- non-existing **ARIA** roles are used.

### How to fix them:

- It is not permissible to use multiple elements with the same identifier (**id** attribute) on a single page.
- Make sure that you use the **ARIA** markup on your website, which complies with the **WAI-ARIA** specification<sup>1</sup>.

## Recommendations for addressing the causes of non-achievement of Component 8 "Quick access to main content of the page"

### Typical errors:

- missing link to access the main content;
- link to access the main content is not working.

<sup>1</sup> WAI-ARIA Overview. <https://www.w3.org/WAI/standards-guidelines/aria/>

### How to fix them:

- Add a link in the header of the website for quick access to the main content<sup>2</sup>.

The mechanism works as follows: when the user opens the page and presses the **Tab** key → the focus moves to the “**Access to main content**” link → user presses **Enter** → the focus jumps directly to the beginning of the main content, bypassing the menu and other secondary elements.

## Recommendations for addressing the causes of non-achievement of Component 9 “Keyboard focus marking”

### Typical errors:

- the keyboard focus indicator is not displayed at all;
- the keyboard focus indicator is not displayed on all links or other interactive elements.

### How to fix them:

- Check if the **CSS** attribute “outline” is used: none; if it is used, you should remove it from the style file (**CSS**); after that, the browser will mark the focus automatically. This is enough to meet the requirements.
- It is recommended to add enhanced focus styles. Enhancements can include a different background colour, a different focus colour, an outline, or a frame.

## Recommendations for addressing the causes of non-achievement of Component 10 “Support for keyboard control”

### Typical errors:

- the submenus of the main menu cannot be expanded using the keyboard (pressing **Enter** either does nothing or triggers a link instead);
- an element that functions as a **button** (for example, an icon for switching to a version for visually impaired users) is created without using the <button> tag or adding the **tabindex=“0”** attribute, which prevents it from receiving keyboard focus.

### How to fix them:

- Standard interactive elements such as buttons (<**button**>), links (<**a href=“”**>), fields (<**input**>), selection lists (<**select**>), etc. are always available for keyboard navigation. This feature is supported on all operating systems. Accessibility issues are usually associated with the use of custom interactive elements. Therefore, it is recommended to use standard interactive elements whenever possible.
- When utilising a custom interactive element, ensure that it includes the **tabindex=“0”** attribute.
- For complex custom interactive elements (such as combo boxes, radio buttons, or carousels), ensure that the role, state, and other properties are conveyed to assistive technologies through the **ARIA** attribute. It is recommended to compare the **ARIA** markup on your website with the sample on the **WAI-ARIA** website<sup>3</sup>.

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2 Skip navigation links. <https://webaim.org/techniques/skipnav/>

3 WAI-ARIA practices. <https://www.w3.org/TR/wai-aria-practices-1.1/>

# Technical recommendations for addressing the causes of non-achievement of mobile application accessibility components

This section provides recommendations for all components, including those for which an adequate level has already been achieved. This makes it possible to ensure a holistic approach and to maintain the achieved indicators at a consistently high level.

## Recommendations for addressing the causes of non-achievement of Component 1 “Sufficient text contrast”

### Typical errors:

- insufficient contrast between text and background;
- insufficient contrast of placeholders in input fields;
- using transparency or gradient.

### How to fix them on Android:

- use colours with a contrast ratio of  $\geq 4.5:1$ ;
- avoid text transparency (**alpha** < 1).

### How to fix them on iOS:

- use colours with a contrast ratio of  $\geq 4.5:1$ ;
- avoid text transparency (**alpha** < 1).

## Recommendations for addressing the causes of non-achievement of Component 2 “Scaling support”

### Typical errors:

- the text is clipped when scaling;
- the interface does not reflow when text is resized;
- text scaling is not supported at all.

### How to fix them on Android:

- use **sp** units instead of **dp**;
- enable automatic text scaling.

### How to fix them on iOS:

- use dynamic font size;
- do not limit the number of text lines.

## Recommendations for addressing the causes of non-achievement of Component 3 “Accessible names for all interactive elements”

### Typical errors:

- graphical buttons lack accessible names; screen readers announce only “Button”.

### How to fix them on Android:

- add an accessible name using **android:contentDescription** or **setContentDescription()**, for example: **contentDescription=“Send”**;
- do not rely on visual text next to an element.

#### How to fix them on iOS:

- add an accessible name using **accessibilityLabel**, for example: `button.accessibilityLabel="Send"`;
- do not rely on visual text next to an element.

### Recommendations for addressing the causes of non-achievement of Component 4 “Accessible roles for all interactive elements”

#### Typical errors:

- custom elements without a role – screen readers do not announce an element role (button, tab, checkbox, etc.);
- switch or tab is implemented as an image;
- use of an inappropriate component.

#### How to fix them on Android:

- use standard elements (**Button, Switch, CheckBox**), and the screen reader will automatically determine their role;
- for custom elements – assign a role, for example **android.widget.Button**.

#### How to fix them on iOS:

- use native components, and the screen reader will automatically determine their role;
- for custom components, set **accessibilityTraits** according to the role: **.button, .header, etc.**

### Recommendations for addressing the causes of non-achievement of Component 5 “Accessible states for all interactive elements”

#### Typical errors:

- state of an element (selected, checked, etc.) is not announced, for example, for tabs or checkboxes.

#### How to fix them on Android:

- for standard states, use standard attributes: **isChecked, isSelected**;
- for custom states, use state description: **stateDescription="Expanded"**.

#### How to fix them on iOS:

- use native components, for which state is determined automatically;
- for custom components, add the appropriate **accessibilityTraits**, for example: **.selected**.

### Recommendations for addressing the causes of non-achievement of Component 6 “Accessible labels for input fields”

#### Typical errors:

- a placeholder is used instead of a label;
- there is no programmatic association between the label and the field;
- icons without text descriptions are used instead of labels next to the field.

#### How to fix them on Android:

- set **android:labelFor** to associate the label with the input field.

#### How to fix them on iOS:

- do not rely solely on placeholders; add visible label next to the field;
- duplicate the label text in the **accessibilityLabel** attribute, for example: **textField.accessibilityLabel="Email"**.

### Recommendations for addressing the causes of non-achievement of Component 7 "Accessible notifications of successful actions or errors"

#### Typical errors:

- pop-up notifications are not announced by screen readers;
- errors are indicated only by a change of field colour;
- notifications do not receive focus or disappear too quickly.

#### How to fix them on Android:

- use android: **accessibilityLiveRegion="polite"**;
- announce changes: **view.announceForAccessibility("Error in field")**;
- ensure that the notification is focused.

#### How to fix them on iOS:

- use **UIAccessibility.post(.announcement, "Error: fill in the field")**;
- for modal dialogues, add attribute **accessibilityViewIsModal=true**;
- in case of an error, return focus to the field.

### Recommendations for addressing the causes of non-achievement of Component 8 "Correct focus order for assistive technologies"

#### Typical errors:

- focus skips part of the interface elements.

#### How to fix them on Android:

- arrange elements in the correct order;
- ensure that all interactive elements are focused in **TalkBack**.

#### How to fix them on iOS:

- arrange elements in the correct order;
- ensure that all interactive elements are focused in **VoiceOver**;
- avoid making containers focusable elements unless necessary.

### Recommendations for addressing the causes of non-achievement of Component 9 "Ability to navigate using simple gestures"

#### Typical errors:

- key functions are available only via custom gestures;
- no alternative is provided for complex gestures.

#### How to fix them on Android:

- use only standard gestures;
- if a non-standard gesture is used, provide clear instructions on how to perform it and offer alternative ways to complete the action.

### How to fix them on iOS:

- use only standard gestures;
- if a non-standard gesture is used, provide clear instructions on how to perform it and offer alternative ways to complete the action.

## Recommendations for addressing the causes of non-achievement of Component 10 “Programmatic determination of screen and section headings”

### Typical errors:

- visual headings are not marked programmatically;
- screen sections lack headings.

### How to fix them on Android:

- mark headings using **android:accessibilityHeading=“true”**.

### How to fix them on iOS:

- set **accessibilityTraits.insert(.header)**.

# Appendix 1.

## Technical report on monitoring results

### I. General information

Indicator's name	Basic accessibility, compliance with DSTU
Reporting period from	September 1, 2025
Reporting period to (inclusive)	November 10, 2025
Data source	Browser: Google Chrome Browser extension: Accessibility Insights for Web 2.46.0 (axe-core 4.10.2)

### II. Websites, indicator components and their scores

Table 1 presents the assessment results of basic accessibility indicator components for 100 websites; Table 2 shows the compliance indicator of 5 websites with the requirements of DSTU EN 301 549:2022 (WCAG 2.1 AA) based on an in-depth audit.

#### Abbreviations used in Table 1:

**C1–C10** — score of relevant component (from 1 to 10).

**BA 2024** — score of basic accessibility for 2025 (current year).

**BA 2024/2023/2022/2021** — score of basic accessibility for previous years 2024/2023/2022/2021.

**Progress over the year** — difference between scores of basic accessibility for 2025 and 2024.

**Progress over 4 years** — difference between scores of basic accessibility for 2025 and 2021.

**N/A** — score is not available because the website was not assessed in the respective year.

**"–"** — comparison results are unavailable because the website was not assessed in the respective year.

**Table 1.** Monitoring results of the basic accessibility of 100 websites

#	Link	Name	C1	C2	C3	C4	C5	C6	C7	C8	C9	C10	BA 2025	BA 2024	BA 2023	BA 2022	BA 2021	Progress over the year	Progress over 4 years
1.	<a href="https://www.kmu.gov.ua/">https://www.kmu.gov.ua/</a>	Website of the Cabinet of Ministers of Ukraine	1	1	0	1	1	1	1	1	1	1	9	4	4	4	4	5	5
2.	<a href="https://www.president.gov.ua/">https://www.president.gov.ua/</a>	Official website of the President of Ukraine	1	1	0	0	1	0	0	0	0	1	4	3	3	2	2	1	2
3.	<a href="https://www.rada.gov.ua/">https://www.rada.gov.ua/</a>	Official web portal of the Verkhovna Rada of Ukraine	0	1	0	1	0	0	0	0	0	0	2	2	2	3	2	0	0
4.	<a href="https://ssu.gov.ua/">https://ssu.gov.ua/</a>	Website of the Security Service of Ukraine	0	1	0	1	0	1	0	0	0	0	3	3	3	4	3	0	0
5.	<a href="https://bank.gov.ua/">https://bank.gov.ua/</a>	Website of the National Bank of Ukraine	1	1	1	1	1	1	1	1	0	1	9	9	7	6	5	0	4
6.	<a href="https://soc.gov.ua/welcome">https://soc.gov.ua/welcome</a>	Social web portal of electronic services of the Ministry of Social Policy	0	1	0	0	1	1	0	0	0	1	4	N	N	N	N	-	-
7.	<a href="https://mev.gov.ua">https://mev.gov.ua</a>	Ministry of Energy of Ukraine	0	0	0	0	1	1	0	1	1	0	4	5	5	6	1	-1	3
8.	<a href="https://brave1.gov.ua">https://brave1.gov.ua</a>	Brave1 Marketplace	1	0	0	1	1	1	1	0	0	1	6	N	N	N	N	-	-
9.	<a href="https://mms.gov.ua/">https://mms.gov.ua/</a>	Ministry of Youth and Sports of Ukraine	1	1	1	1	1	1	1	1	1	1	10	5	5	5	5	5	5
10.	<a href="https://thedigital.gov.ua/">https://thedigital.gov.ua/</a>	Ministry of Digital Transformation of Ukraine	1	1	1	1	1	1	1	1	1	1	10	5	6	6	5	5	5
11.	<a href="https://www.me.gov.ua/">https://www.me.gov.ua/</a>	Ministry of Economy, Environment and Agriculture of Ukraine	1	1	1	1	1	1	1	0	1	1	9	7	7	3	3	2	6
12.	<a href="http://mvs.gov.ua/">http://mvs.gov.ua/</a>	Ministry of Internal Affairs of Ukraine	1	1	1	1	1	1	0	0	1	1	8	8	5	6	5	0	3
13.	<a href="https://nssu.gov.ua">https://nssu.gov.ua</a>	National Social Service of Ukraine	1	1	1	1	1	1	1	1	1	1	10	N	N	N	N	-	-
14.	<a href="https://mfa.gov.ua/">https://mfa.gov.ua/</a>	Ministry of Foreign Affairs of Ukraine	0	1	0	0	0	0	0	0	0	1	2	1	1	2	2	1	0
15.	<a href="https://mindev.gov.ua">https://mindev.gov.ua</a>	Ministry of Communities, Territories and Infrastructure Development of Ukraine	1	1	1	1	1	1	1	1	1	1	10	N	N	N	N	-	-

#	Link	Name	C1	C2	C3	C4	C5	C6	C7	C8	C9	C10	BA 2025	BA 2024	BA 2023	BA 2022	BA 2021	Progress over the year	Progress over 4 years
16.	<a href="https://mcsc.gov.ua/">https://mcsc.gov.ua/</a>	Ministry of Culture and Information Policy of Ukraine	0	1	0	1	1	1	1	0	0	1	6	6	5	4	4	0	2
17.	<a href="https://mod.gov.ua/">https://mod.gov.ua/</a>	Ministry of Defence of Ukraine	0	1	1	1	1	1	1	1	1	1	9	5	5	6	3	4	6
18.	<a href="https://mon.gov.ua/">https://mon.gov.ua/</a>	Ministry of Education and Science of Ukraine	1	1	1	1	1	1	1	1	1	1	10	8	3	5	3	2	7
19.	<a href="https://moz.gov.ua/">https://moz.gov.ua/</a>	Ministry of Health of Ukraine	0	0	0	1	1	1	0	1	1	0	5	4	2	3	4	1	1
20.	<a href="https://dsp.gov.ua/">https://dsp.gov.ua/</a>	State Labour Service of Ukraine	1	1	1	1	1	1	1	0	1	0	8	5	5	N	N	3	-
21.	<a href="https://www.msp.gov.ua/">https://www.msp.gov.ua/</a>	Ministry of Social Policy, Family and Unity of Ukraine	1	1	1	1	1	1	1	1	1	0	9	6	6	7	4	3	5
22.	<a href="https://mva.gov.ua/">https://mva.gov.ua/</a>	Ministry of Veterans Affairs of Ukraine	0	0	0	1	0	1	1	0	1	1	5	5	3	3	3	0	2
23.	<a href="https://mof.gov.ua/uk">https://mof.gov.ua/uk</a>	Ministry of Finance of Ukraine	0	1	1	1	1	1	1	0	1	1	8	7	6	6	6	1	2
24.	<a href="https://minjust.gov.ua/">https://minjust.gov.ua/</a>	Ministry of Justice of Ukraine	0	0	1	0	1	1	0	0	0	1	4	4	4	4	4	0	0
25.	<a href="https://dpss.gov.ua">https://dpss.gov.ua</a>	State Service of Ukraine on Food Safety and Consumer Protection	1	0	0	1	1	1	0	1	1	1	7	N	N	N	N	-	-
26.	<a href="https://id.gov.ua/">https://id.gov.ua/</a>	Integrated system of electronic identification	0	0	1	1	1	0	1	0	0	1	5	5	5	5	5	0	0
27.	<a href="https://data.gov.ua/">https://data.gov.ua/</a>	Unified state open data web portal	1	0	1	1	1	0	1	0	0	1	6	6	5	5	5	0	1
28.	<a href="https://diia.gov.ua">https://diia.gov.ua</a>	Unified state web portal of electronic services Diia	1	1	1	1	1	1	1	1	1	1	10	8	2	2	2	2	8
29.	<a href="https://osvita.diia.gov.ua">https://osvita.diia.gov.ua</a>	Diia.Education	1	1	1	1	1	0	1	0	1	1	8	9	3	2	2	-1	6
30.	<a href="https://business.diia.gov.ua">https://business.diia.gov.ua</a>	Diia.Business	0	1	1	0	0	1	1	0	0	1	5	5	7	7	7	0	-2
31.	<a href="https://court.gov.ua/fair/">https://court.gov.ua/fair/</a>	Search for court cases	0	1	0	1	1	1	0	0	0	0	4	4	4	5	N	0	-
32.	<a href="https://guide.diia.gov.ua/">https://guide.diia.gov.ua/</a>	Guide to public services	1	0	1	1	1	1	0	0	0	0	5	5	5	5	6	0	-1

#	Link	Name	C1	C2	C3	C4	C5	C6	C7	C8	C9	C10	BA 2025	BA 2024	BA 2023	BA 2022	BA 2021	Progress over the year	Progress over 4 years
33.	<a href="https://center.diia.gov.ua/">https://center.diia.gov.ua/</a>	Diia.Centre	0	1	0	0	1	1	1	0	0	0	4	4	4	4	4	0	0
34.	<a href="https://city.diia.gov.ua/">https://city.diia.gov.ua/</a>	Diia.City	1	1	1	1	1	1	1	1	1	1	10	5	5	5	4	5	6
35.	<a href="https://e.land.gov.ua/services">https://e.land.gov.ua/services</a>	Web resource of electronic services of the State GeoCadastr	1	1	1	1	1	1	1	0	0	1	8	7	6	7	7	1	1
36.	<a href="https://cabinet.tax.gov.ua/">https://cabinet.tax.gov.ua/</a>	E-Cabinet of the Taxpayer of the State Tax Service	1	1	0	0	1	1	1	0	0	0	5	5	5	8	6	0	-1
37.	<a href="https://asvpweb.minjust.gov.ua/#/search-debtors">https://asvpweb.minjust.gov.ua/#/search-debtors</a>	Search for enforcement proceedings	0	0	1	1	1	0	1	1	0	0	5	6	5	3	N	-1	-
38.	<a href="https://portal.pfu.gov.ua/sidebar/Templates/Default">https://portal.pfu.gov.ua/sidebar/Templates/Default</a>	Electronic services portal of the Pension Fund of Ukraine	1	1	1	1	1	1	1	1	1	1	10	4	4	4	4	6	6
39.	<a href="https://drs.gov.ua/">https://drs.gov.ua/</a>	State Regulatory Service	1	0	0	0	1	1	1	0	0	0	4	N	N	N	N	-	-
40.	<a href="https://policy.mtsbu.ua/">https://policy.mtsbu.ua/</a>	CMTPL insurance policy validation	0	1	1	1	1	0	0	1	0	1	6	6	6	6	N	0	-
41.	<a href="https://corruptinfo.nazk.gov.ua/">https://corruptinfo.nazk.gov.ua/</a>	Unified state register of persons who have committed corruption or corruption-related offences	1	0	0	1	0	1	0	0	0	1	4	4	4	5	8	0	-4
42.	<a href="https://legalaid.gov.ua/">https://legalaid.gov.ua/</a>	Free legal aid	0	1	1	1	1	1	1	0	1	1	8	7	8	8	N	1	-
43.	<a href="https://fju.gov.ua">https://fju.gov.ua</a>	State financial monitoring	1	0	1	1	1	1	0	0	0	0	5	5	5	7	N	0	-
44.	<a href="https://e-services.davr.gov.ua">https://e-services.davr.gov.ua</a>	Portal of electronic services, State Agency of Water Resources of Ukraine	1	0	1	1	1	1	1	0	1	1	8	8	8	8	8	0	0
45.	<a href="http://diam.gov.ua/">http://diam.gov.ua/</a>	State Inspectorate of Architecture and Urban Planning of Ukraine	1	1	0	1	1	1	1	1	1	1	9	N	N	N	N	-	-
46.	<a href="https://wanted.mvs.gov.ua/passport/">https://wanted.mvs.gov.ua/passport/</a>	Search for a passport among the stolen or lost ones	1	1	1	0	1	0	1	0	1	1	7	6	7	7	N	1	-
47.	<a href="https://dmsu.gov.ua/services/online.html">https://dmsu.gov.ua/services/online.html</a>	Electronic queue in the State Migration Service of Ukraine	0	1	0	0	1	1	1	0	1	1	6	2	3	3	3	4	3
48.	<a href="https://bf.diia.gov.ua/">https://bf.diia.gov.ua/</a>	Diia.Barrier-Free	1	1	1	1	1	1	1	1	1	1	10	10	10	10	N	0	-

#	Link	Name	C1	C2	C3	C4	C5	C6	C7	C8	C9	C10	BA 2025	BA 2024	BA 2023	BA 2022	BA 2021	Progress over the year	Progress over 4 years
49.	<a href="https://www.spfu.gov.ua/">https://www.spfu.gov.ua/</a>	State Property Fund of Ukraine	0	1	0	0	0	1	0	0	0	1	3	3	4	3	3	0	0
50.	<a href="https://dpsu.gov.ua/ua/map">https://dpsu.gov.ua/ua/map</a>	Interactive map of checkpoints / Entry-exit checkpoints	1	1	1	1	1	1	1	0	1	1	9	5	3	2	4	4	5
51.	<a href="https://lms.e-school.net.ua/">https://lms.e-school.net.ua/</a>	All-Ukrainian school online	0	1	1	1	1	1	0	1	0	1	7	8	8	8	N	-1	-
52.	<a href="https://registry.edbo.gov.ua/">https://registry.edbo.gov.ua/</a>	Register of educational entities	1	1	1	1	1	1	1	0	0	0	7	7	7	8	3	0	4
53.	<a href="https://e-services.dsns.gov.ua/">https://e-services.dsns.gov.ua/</a>	Portal of electronic services of the State Emergency Service	0	1	0	1	1	1	1	0	1	1	7	6	7	7	7	1	0
54.	<a href="https://nszu.gov.ua/">https://nszu.gov.ua/</a>	National Health Service of Ukraine	0	1	0	0	1	0	1	0	0	0	3	3	3	N	N	0	-
55.	<a href="https://spending.gov.ua/login">https://spending.gov.ua/login</a>	Unified web portal for spending public funds	1	1	1	1	1	1	1	1	1	1	10	4	4	3	3	6	7
56.	<a href="https://acskidd.gov.ua/manage-certificates">https://acskidd.gov.ua/manage-certificates</a>	Repeated (remote) formation of certificates by electronic request	0	0	0	1	0	1	0	0	1	1	4	3	4	4	3	1	1
57.	<a href="https://czo.gov.ua/verify">https://czo.gov.ua/verify</a>	Online service for verification of a qualified electronic signature or seal for electronic documents	0	1	1	1	1	1	1	1	1	0	8	8	8	6	5	0	3
58.	<a href="https://nads.gov.ua/">https://nads.gov.ua/</a>	National Agency of Ukraine on Civil Service	1	1	0	1	1	1	1	1	1	1	9	4	4	N	N	5	-
59.	<a href="https://info.edbo.gov.ua/edu-documents/">https://info.edbo.gov.ua/edu-documents/</a>	Register of documents on education	0	1	1	1	1	1	1	0	0	0	6	6	6	6	4	0	2
60.	<a href="https://dsns.gov.ua/">https://dsns.gov.ua/</a>	State Emergency Service	1	1	0	1	1	1	0	0	0	1	6	6	6	5	N	0	-
61.	<a href="https://id.court.gov.ua/">https://id.court.gov.ua/</a>	Electronic Court	1	1	1	1	1	0	1	1	0	1	8	9	8	8	7	-1	1
62.	<a href="https://nazk.gov.ua/uk/">https://nazk.gov.ua/uk/</a>	National Agency on Corruption Prevention	0	1	0	1	0	1	0	0	1	1	5	N	N	N	N	-	-
63.	<a href="https://wanted.mvs.gov.ua/searchtransport/">https://wanted.mvs.gov.ua/searchtransport/</a>	Vehicles on a wanted list	1	1	1	0	1	0	1	0	1	1	7	6	7	7	6	1	1

#	Link	Name	C1	C2	C3	C4	C5	C6	C7	C8	C9	C10	BA 2025	BA 2024	BA 2023	BA 2022	BA 2021	Progress over the year	Progress over 4 years
64.	<a href="https://petition.president.gov.ua/">https://petition.president.gov.ua/</a>	Electronic petitions, official website of the President of Ukraine	0	1	0	0	1	0	1	0	0	1	4	4	4	4	4	0	0
65.	<a href="https://itd.rada.gov.ua/idsrv/Account/Login?returnUrl=%2Fidsrv">https://itd.rada.gov.ua/idsrv/Account/Login?returnUrl=%2Fidsrv</a>	Electronic services of the Verkhovna Rada of Ukraine	1	1	1	1	1	1	1	0	1	0	8	6	6	6	7	2	1
66.	<a href="http://www.drlz.com.ua/">http://www.drlz.com.ua/</a>	Register of Medicinal Products	1	0	1	1	1	0	1	0	1	1	7	7	7	7	N	0	-
67.	<a href="https://nabu.gov.ua/">https://nabu.gov.ua/</a>	National Anti-Corruption Bureau of Ukraine	0	0	0	0	1	1	1	0	0	0	3	3	4	N	N	0	-
68.	<a href="https://reyestr.court.gov.ua/">https://reyestr.court.gov.ua/</a>	Unified State Register of Court Decisions	0	1	1	1	0	0	1	0	1	1	6	6	6	6	6	0	0
69.	<a href="https://ek-cbi.msp.gov.ua/">https://ek-cbi.msp.gov.ua/</a>	E-Cabinet of a person with disability	1	1	1	1	1	1	1	0	0	1	8	7	8	5	N	1	-
70.	<a href="https://www.npu.gov.ua/">https://www.npu.gov.ua/</a>	National Police of Ukraine	1	1	1	1	1	1	1	1	1	1	10	4	5	N	N	6	-
71.	<a href="https://ern.minjust.gov.ua/pages/default.aspx">https://ern.minjust.gov.ua/pages/default.aspx</a>	Unified Register of Notaries	1	0	0	1	1	0	0	1	1	0	5	5	5	6	5	0	0
72.	<a href="https://apostille.minjust.gov.ua/">https://apostille.minjust.gov.ua/</a>	Unified Register of Apostilles	0	1	0	0	0	0	1	0	1	1	4	4	4	4	4	0	0
73.	<a href="https://pasport.org.ua/services">https://pasport.org.ua/services</a>	Services of centres "Passport Service"	1	1	1	1	1	1	1	0	0	1	8	6	6	6	6	2	2
74.	<a href="https://e-construction.gov.ua/">https://e-construction.gov.ua/</a>	Portal of the state electronic system in the field of construction	0	1	0	1	1	0	1	0	1	1	6	4	4	6	4	2	2
75.	<a href="https://usr.minjust.gov.ua/content/free-search">https://usr.minjust.gov.ua/content/free-search</a>	Unified state register of legal entities, individual entrepreneurs and public formations (free search)	0	1	1	0	1	1	1	0	1	1	7	7	7	7	7	0	0
76.	<a href="http://cg.gov.ua/">http://cg.gov.ua/</a>	Chernihiv Regional State Administration	1	0	0	1	1	1	0	0	0	1	5	3	3	3	2	2	3
77.	<a href="http://www.vin.gov.ua/">http://www.vin.gov.ua/</a>	Vinnitsia Regional State Administration	1	1	0	1	1	1	1	1	1	1	9	10	10	4	3	-1	6
78.	<a href="http://voladm.gov.ua/">http://voladm.gov.ua/</a>	Volyn Regional State Administration	0	1	1	1	1	1	1	0	0	1	7	6	7	4	4	1	3

#	Link	Name	C1	C2	C3	C4	C5	C6	C7	C8	C9	C10	BA 2025	BA 2024	BA 2023	BA 2022	BA 2021	Progress over the year	Progress over 4 years
79.	<a href="http://adm.dp.gov.ua/">http://adm.dp.gov.ua/</a>	Dnipropetrovsk Regional State Administration	0	0	0	1	1	0	0	0	0	0	2	2	2	2	2	0	0
80.	<a href="http://dn.gov.ua/">http://dn.gov.ua/</a>	Donetsk Regional State Administration	1	1	1	1	1	1	0	1	1	1	9	2	2	2	2	7	7
81.	<a href="https://oda.zht.gov.ua/">https://oda.zht.gov.ua/</a>	Zhytomyr Regional State Administration	0	0	0	0	1	1	0	0	0	0	2	4	4	2	3	-2	-1
82.	<a href="https://carpathia.gov.ua/">https://carpathia.gov.ua/</a>	Zakarpattia Regional State Administration	1	1	1	1	1	1	1	1	1	1	10	3	3	2	2	7	8
83.	<a href="https://www.zoda.gov.ua/">https://www.zoda.gov.ua/</a>	Zaporizhzhia Regional State Administration	0	0	0	0	1	0	0	0	1	0	2	1	2	2	3	1	-1
84.	<a href="https://www.if.gov.ua/">https://www.if.gov.ua/</a>	Ivano-Frankivsk Regional State Administration	1	1	1	1	1	1	1	1	1	1	10	3	2	2	2	7	8
85.	<a href="http://koda.gov.ua/">http://koda.gov.ua/</a>	Kyiv Regional State Administration	1	1	0	1	1	1	0	0	0	0	5	5	5	4	6	0	-1
86.	<a href="http://www.kr-admin.gov.ua/">http://www.kr-admin.gov.ua/</a>	Kirovohrad Regional State Administration	0	1	0	0	0	1	1	0	1	1	5	5	5	5	5	0	0
87.	<a href="https://lova.gov.ua/">https://lova.gov.ua/</a>	Luhansk Regional State Administration	1	1	1	1	1	1	1	1	1	1	10	6	5	5	3	4	7
88.	<a href="https://loda.gov.ua/">https://loda.gov.ua/</a>	Lviv Regional State Administration	1	1	1	1	1	1	1	1	1	1	10	10	10	7	0	0	10
89.	<a href="http://www.mk.gov.ua/">http://www.mk.gov.ua/</a>	Mykolaiv Regional State Administration	0	0	0	1	1	1	0	0	0	1	4	4	4	4	3	0	1
90.	<a href="https://oda.od.gov.ua/">https://oda.od.gov.ua/</a>	Odesa Regional State Administration	0	1	1	1	1	1	1	0	1	1	8	5	5	5	4	3	4
91.	<a href="https://poda.gov.ua/">https://poda.gov.ua/</a>	Poltava Regional State Administration	0	1	1	1	1	1	0	1	1	1	8	8	8	5	5	0	3
92.	<a href="https://www.rv.gov.ua/">https://www.rv.gov.ua/</a>	Rivne Regional State Administration	1	1	1	1	1	1	1	1	1	1	10	2	2	2	2	8	8
93.	<a href="http://sm.gov.ua/">http://sm.gov.ua/</a>	Sumy Regional State Administration	0	1	0	1	1	1	1	0	0	1	6	5	6	6	5	1	1
94.	<a href="https://oda.te.gov.ua/">https://oda.te.gov.ua/</a>	Ternopil Regional State Administration	1	1	0	1	1	1	1	1	1	1	9	2	3	2	2	7	7

#	Link	Name	C1	C2	C3	C4	C5	C6	C7	C8	C9	C10	BA 2025	BA 2024	BA 2023	BA 2022	BA 2021	Progress over the year	Progress over 4 years
95.	<a href="https://kharkivoda.gov.ua/">https://kharkivoda.gov.ua/</a>	Kharkiv Regional State Administration	1	1	1	1	1	1	1	0	1	1	9	9	9	9	5	0	4
96.	<a href="https://khoda.gov.ua/">https://khoda.gov.ua/</a>	Kherson Regional State Administration	1	0	0	0	1	1	0	0	0	1	4	3	3	3	3	1	1
97.	<a href="http://www.adm.km.ua/">http://www.adm.km.ua/</a>	Khmelnyskyi Regional State Administration	0	0	0	0	1	1	1	0	1	0	4	4	3	4	4	0	0
98.	<a href="https://ck-oda.gov.ua/">https://ck-oda.gov.ua/</a>	Cherkasy Regional State Administration	0	0	0	1	1	1	1	0	0	0	4	4	4	4	4	0	0
99.	<a href="https://bukoda.gov.ua/">https://bukoda.gov.ua/</a>	Chernivtsi Regional State Administration	1	1	0	1	1	1	1	1	1	1	9	3	3	3	3	6	6
100.	<a href="https://grants.vzaemo.dia.gov.ua">https://grants.vzaemo.dia.gov.ua</a>	Electronic tender space	0	1	0	0	1	0	1	0	0	1	4	4	4	4	4	0	0
<b>Total achieved:</b>			55	74	54	76	88	79	70	36	57	74							
			55%	74%	54%	76%	88%	79%	70%	36%	57%	74%							

**Table 2.** In-depth assessment of five websites

#	Name	URL	Compliance, %	Compliance level
15	Ministry of Communities and Territories Development of Ukraine	<a href="https://mindev.gov.ua/">https://mindev.gov.ua/</a>	78	Partial compliance
38	Ministry of Education and Science of Ukraine	<a href="https://portal.pfu.gov.ua/sidebar/Templates/Default">https://portal.pfu.gov.ua/sidebar/Templates/Default</a>	78	Partial compliance
18	Electronic services portal of the PFU	<a href="https://mon.gov.ua/">https://mon.gov.ua/</a>	80	Partial compliance
10	Ministry of Digital Transformation of Ukraine	<a href="https://thedigital.gov.ua">https://thedigital.gov.ua</a>	94	High compliance
28	Web portal Diia	<a href="https://diia.gov.ua">https://diia.gov.ua</a>	94	High compliance

# Appendix 2.

## Government websites and mobile applications accessibility monitoring methodology

### Introduction

The extended methodology of assessing the accessibility of government websites and mobile applications has been developed to provide a comprehensive verification of the digital accessibility of resources of government authorities and local self-government bodies in Ukraine. It complies with modern international standards, including WCAG 2.1 and DSTU EN 301 549:2022, and is designed to provide not only baseline verification but also an in-depth assessment of website and mobile application accessibility.

The need to extend the methodology arose due to the limitations of the previous approach, which allowed only to assess the basic accessibility level. The previously used basic accessibility monitoring methodology enabled a quick assessment of a large number of websites and their accessibility across ten components (seven automated verifications and three manual). However, a maximum score of ten could be perceived as full compliance, while it did not provide a complete picture of a website's compliance with international standards.

The extended methodology uses a two-level approach: the first level (basic assessment) is a quick analysis of a large set of digital resources, while the second level (in-depth monitoring) is a detailed verification against all criteria of WCAG 2.1 standard at levels A and AA. This approach allows establishing clear indicators, conducting regular monitoring of changes, and recognising websites and applications that meet high accessibility standards with special certificates.

The extended methodology also includes an assessment tool for mobile applications, taking into account the specifics of mobile platforms and accessibility requirements, including the use of assistive technologies on mobile devices (VoiceOver, TalkBack). Mobile applications are tested for contrast, screen reader compatibility, text scaling support, gesture-based functionality and alternative interaction methods.

Thus, this extended methodology enables supervisory authorities, other public authorities and local self-government bodies to not only quickly assess the current accessibility status of their digital resources but also systematically improve it, ensuring equal opportunities for all citizens of Ukraine, regardless of sensory, cognitive or physical impairments.

### 1. General provisions

This methodology defines:

- main components of accessibility indicator of websites and mobile applications of government authorities for users with visual, auditory, motor, speech and intellectual impairments, as well as with various combinations of these impairments; and the level of compliance with DSTU EN 301 549:2022 (hereinafter – accessibility monitoring);
- the scoring system used to measure the components;

- the mechanism of assessing the achievement of indicators and their components;
- the preparation and submission of reports on monitoring results (hereinafter – monitoring reporting).

## 2. Assessment methods

### 2.1. Description of methods

- Basic website accessibility assessment – assessment of the website home page against 10 components.
- In-depth website accessibility assessment – assessment of selected websites against 50 criteria of the Web Content Accessibility Guidelines (WCAG) 2.1 at Levels A and AA.
- Mobile application accessibility assessment – assessment of mobile applications against 10 components.

### 2.2. Preconditions for using each assessment method

Basic website accessibility assessment is used for all monitored websites (100 websites or more).

In-depth website assessment (DSTU compliance) is used for websites whose basic accessibility level was assessed as high based on the results of the previous monitoring stage.

Mobile application assessment is used for all applications.

## 3. Basic website accessibility assessment

The basic accessibility assessment methodology fully corresponds to the methodology developed in 2021.

### 3.1. Basic accessibility indicator components

The basic accessibility indicator components are based on DSTU EN 301 549:2022. The full list of components is provided in Annex 1.

To fully understand the accessibility indicator components, the following should be taken into account.

**Component 1. Sufficient text contrast** – the contrast ratio of any text on the page against the background must be at least 4.5:1. If the contrast of regular text is less than 4.5:1 or bold/large text is less than 3:1, **the component is considered unachieved**.

**Component 2. Availability of alternative text for all images** – all images must have alternative text provided using the alt attribute. If one or more images lack alternative text, **the component is considered unachieved**.

**Component 3. Availability of accessible text for all hyperlinks** – hyperlinks must either have visible text or, if an icon or image is used instead of visible text, a hidden text label accessible to screen readers must be provided. If one or more hyperlinks lack accessible text, **the component is considered unachieved**.

**Component 4. Availability of text labels for all buttons** – buttons must have visible text or, if an icon or image is used instead of visible text, a text label accessible to screen readers must be provided. If one or more buttons lack a text label, **the component is considered unachieved**.

**Component 5. Availability of text labels for form fields** – each field must have a text label describing its purpose that does not disappear after information is entered. If one or more fields lack text labels, or a text label disappears after information is entered in that field, **the component is considered unachieved.**

**Component 6. Software determination of main language of the page** – main language of the page must be specified using the lang attribute. If the lang attribute is missing or its value does not match the language in which the page content is presented, **the component is considered unachieved.**

**Component 7. Lack of errors in the page code** – the page code must comply with the specification of HTML and other languages used, e.g., WAI ARIA. If the page contains more than one element with the same id attribute value or if WAI ARIA markup rules are violated, **the component is considered unachieved.**

**Component 8. Quick access to main content of the page** – if menus or other secondary content are placed before the main page content, a link must be provided at the top of the page allowing users to skip directly to the main content. If such a link is missing, **the component is considered unachieved.**

**Component 9. Keyboard focus marking** – when navigating with a keyboard, the current keyboard focus must be visually identifiable. If one or more elements lack focus marking during keyboard navigation, **the component is considered unachieved.**

**Component 10. Support for keyboard control** – all hyperlinks, buttons, input fields, and other elements that can be focused using the mouse can also be focused using the keyboard. If one or more elements that can be focused using the mouse cannot be focused using the keyboard, **the component is considered unachieved.**

### **3.2. Assessment data**

The achievement of the indicator and its components is assessed based on data obtained as a result of visual inspection of the website pages and analysis of the website page code using specialised accessibility assessment tools.

The monitoring entities and authorities involved in the monitoring process may, at their own discretion, determine the source of assessment data for each indicator component, unless otherwise determined by the procedure for information interaction between the monitoring system and electronic information resources of the said entities and authorities.

### **3.3. Assessment of the achievement of the basic accessibility indicator and its components**

#### **3.3.1. Assessment of the achievement of indicator components using measurement unit "1/0"**

If, according to the assessed data, the indicator component:

- 1) is achieved – the measurement unit of the indicator component is set to "1". In this case, the score is equal to 1 point;
- 2) is not achieved – the measurement unit of the indicator component is set to "0". In this case, the score is equal to 0 points.

#### **3.3.2. Assessment of the achievement of basic accessibility indicator using measurement unit "0-10"**

The basic accessibility indicator is equal to the sum of points of all its components.

### 3.3.3. Determining the level of basic accessibility

The level of basic accessibility of a website is calculated based on the basic accessibility indicator on the following scale:

- 0–3 points – low level of basic accessibility;
- 4–6 points – average level of basic accessibility;
- 7–8 points – sufficient level of basic accessibility;
- 9–10 points – high level of basic accessibility.

## 4. In-depth website accessibility assessment

The in-depth assessment is conducted to determine the compliance of websites with DSTU EN 301 549:2022. The indicator is DSTU compliance.

The assessment should cover the following pages (if available):

- 1) home page, login page, sitemap, contacts, help and legal information pages;
- 2) at least one relevant page for each type of service provided by the website and for any other main website functionality, including search;
- 3) pages containing the accessibility statement or policy and a contact mechanism (if available);
- 4) examples of pages that are significantly different or provide a different type of content;
- 5) at least one relevant downloadable document for each type of service provided and any other main website functionality, if possible;
- 6) any other pages considered relevant by the assessment experts;
- 7) randomly selected pages representing at least 10% of the sample described in paragraphs 1–7.

The recommended number of pages in the sample is 10 to 20.

### 4.1. The compliance indicator components and their scoring

The compliance indicator components are based on DSTU EN 301 549:2022 and cover all WCAG 2.1 criteria at levels A and AA, as provided in Section 9 of the standard.

A full list of criteria and verification questions is provided in Annex 2.

### 4.2. Assessment data

Achievement of the compliance indicator and its components is assessed based on the assessment data of visual verification of website pages and analysis of website page code using specialised accessibility verification tools.

The monitoring entities and authorities involved in the monitoring process may determine, at their discretion, the source of assessment data for each indicator component, unless otherwise specified by the procedure for information interaction between the monitoring system and the electronic information resources of the said entities and authorities.

### 4.3. Assessment of the achievement of compliance indicator and its components

#### 4.3.1. Assessment of compliance with DSTU using measurement unit “0-100%”

The compliance percentage is calculated using the following formula: compliance percentage = (Number of criteria achieved / Total number of criteria used).

**Note:** The percentage score is only an indicator and does not constitute official compliance status. Any score below 100% indicates non-compliance with WCAG / DSTU. According to the requirements of the standard, a website either complies with this standard or does not.

### 4.3.2. Determination of the DSTU compliance level

The compliance level is determined by the compliance percentage:

- non-compliance (<70%);
- partial compliance (71-90%);
- high compliance (90-99%);
- full compliance (100%).

## 5. Mobile application accessibility assessment

Mobile application accessibility assessment involves determining the level of basic accessibility of mobile applications.

The assessment should cover the following sections (if available):

- 1) home screen, login screen, contacts, help and legal information;
- 2) screens for each type of service, search screen;
- 3) pages containing an accessibility statement or policy and a contact mechanism (if available);
- 4) examples of screens/processes that are significantly different or provide a different type of content;
- 5) at least one relevant downloadable document, if possible, for each type of service provided in the application and any other primary functionality;
- 6) any other screen considered relevant by the assessment experts.

### 5.1. Mobile application accessibility indicator components

The components of the basic accessibility indicator for mobile applications are determined in accordance with the requirements of DSTU EN 301 549:2022, as well as WCAG 2.1, taking into account mobile-specific aspects.

The achievement of each of the listed components is assessed. If the conditions of a component are not met for at least one element or screen, the component is considered unachieved.

To fully understand the mobile application accessibility indicator components, the following should be considered.

**Component 1. Sufficient text contrast** – the contrast ratio of any text against its background must be at least 4.5:1. This applies to main text, button text, tabs, notifications, etc. If at least one text element is insufficiently contrasted, **the component is considered unachieved.**

**Component 2. Scaling support** – the mobile application interface must support the system text scaling configured on the device. If the text cannot be scaled or disappears/is cropped due to scaling, **the component is considered unachieved.**

**Component 3. Accessible names for all interactive elements** – all interactive elements (buttons, links, tabs, icons, etc.) must have an accessible name announced using assistive technologies. If at least one element lacks an accessible name, **the component is considered unachieved.**

**Component 4. Accessible roles for all interactive elements** – each interactive element must be properly classified in terms of a role (e.g., button, switch, input field, etc.), and this role must be accessible to assistive technologies. If the role is missing or incorrect, **the component is considered unachieved.**

**Component 5. Accessible states for all interactive elements** – all states (e.g., on/off, selected/unselected, loading, etc.) must be announced using assistive technologies. If a dynamic state of at least one element is not announced, **the component is considered unachieved**.

**Component 6. Accessible labels for input fields** – each input field must have a clear accessible label announced using assistive technologies, even if implemented non-visually. If at least one field lacks such a label, **the component is considered unachieved**.

**Component 7. Accessible notifications of successful actions or errors** – any notifications of errors, warnings or successful actions must be accessible to assistive technologies. If a notification appears but is not announced, **the component is considered unachieved**.

**Component 8. Correct focus order for assistive technologies** – focus order must follow the logical interface order when navigating with a screen reader (TalkBack, VoiceOver). If focus moves illogically or skips some elements, **the component is considered unachieved**.

**Component 9. Ability to navigate using simple gestures** – core application functions must be accessible using standard assistive technology gestures (swipe, double tap, hold, etc.). If interaction requires a complex or non-standard gesture without an alternative, **the component is considered unachieved**.

**Component 10. Software determination of screen and section headings** – screen and section headings must be programmatically determined so that screen readers can announce them as headings. If a screen heading is visually present but not announced by screen readers, **the component is considered unachieved**.

## 5.2. Assessment data

The achievement of the indicator and its components is assessed based on assessment data obtained through visual inspection of mobile application screens, testing using platform-specific assistive technologies (e.g., TalkBack on Android and VoiceOver on iOS), analysis of screenshots using specialised contrast assessment tools, etc.

The monitoring entities and authorities involved in conducting the monitoring determine, at their own discretion, the source of assessment data for each component of the indicator, unless otherwise specified by the procedure for information exchange between the monitoring system and the electronic information resources of the relevant entities and authorities.

## 5.3. Assessment of the achievement of the basic accessibility indicator of mobile applications and its components

### 5.3.1. Assessment of the achievement of indicator components using the measurement unit "1/0"

If, based on the assessment data, the indicator component:

- 1) is achieved – the measurement unit of the indicator component is set to "1". In this case, the score is 1 point;
- 2) is not achieved – the measurement unit of the indicator component is set to "0". In this case, the score is 0 points.

### 5.3.2. Assessment of the achievement of the basic accessibility indicator of mobile applications using the measurement unit "0-10"

The basic accessibility indicator of mobile applications is equal to the sum of points across all its components.

### 5.3.3. Determining the level of basic accessibility of mobile applications

The level of basic accessibility of a mobile application is calculated based on the basic accessibility indicator of the mobile application according to the following scale:

- 0–3 points – low level of basic accessibility;
- 4–6 points – average level of basic accessibility;
- 7–8 points – sufficient level of basic accessibility;
- 9–10 points – high level of basic accessibility.

## 6. Procedure for preparing and submitting monitoring reports

The monitoring reporting form provided in Annex 4 consists of three sections.

- Section I “General information”:
  - in the fields “Reporting period from” and “Reporting period to (inclusive)”, the start and end dates of the reporting period are indicated, respectively, in the format dd.mm.yyyy. The start date of the current reporting period is the day following the end date of the previous reporting period;
  - in the field “Number of websites (basic assessment)”, the number of websites assessed using the basic assessment method is indicated;
  - in the field “Number of websites (in-depth assessment)”, the number of websites to which the in-depth assessment method was used is indicated;
  - in the field “Number of mobile applications”, the number of analysed mobile applications is indicated.
- Section II “Websites/mobile applications, indicator components and their scores” presents, in Tables 1-3 respectively, data for websites assessed using the basic assessment method, websites assessed using the in-depth assessment method, and mobile applications.
- Section III “List of indicator components not achieved and recommendations for addressing the causes of non-achievement” outlines the indicator components that were not achieved, as well as recommended actions to address the indicated causes.

Information for each assessment method is presented separately.

## Annex 1 to the Methodology.

### Basic website accessibility assessment criteria

**Table 1.** Accessibility criteria

Component	DSTU EN 301 549:2022 Criterion
1. Sufficient text contrast	9.1.4.3
2. Availability of alternative text for all images	9.1.1.1
3. Availability of accessible text for all hyperlinks	9.4.1.2
4. Availability of text labels for all buttons	9.4.1.2
5. Availability of text labels for form fields	9.4.1.2
6. Software determination of main language of the page	9.3.1.1
7. Lack of errors in the page code	9.4.1.1
8. Quick access to main content of the page	9.2.4.1
9. Keyboard focus marking	9.2.4.7
10. Support for keyboard control	9.2.1.1

## Annex 2 to the Methodology.

### In-depth website accessibility assessment criteria

Table 1 presents the criteria for in-depth assessment of websites for compliance with DSTU EN 301 549:2022 (WCAG 2.1 AA). The left column contains the WCAG 2.1 criteria of level AA, while the right column provides simplified verification questions for each criterion. A criterion is considered met if all verification questions can be answered in the affirmative.

**Table 1.** In-depth assessment criteria

Criterion	Verification questions
1.1.1. Non-text content	<ul style="list-style-type: none"><li>• Do images have appropriate text alternatives?</li><li>• Does each CAPTCHA image have alternative text?</li><li>• If CAPTCHA is used, does it provide an alternative for users with visual impairments, blindness and hearing impairments?</li><li>• Is there an appropriate alternative for all cryptographic content (ASCII art, emoji, cryptographic syntax)?</li></ul>
1.2.1. Audio-only and video-only content (recorded)	<ul style="list-style-type: none"><li>• For pre-recorded audio content: is an equivalent text transcript provided?</li><li>• For pre-recorded video content: is a text transcript or an audio track with equivalent information provided?</li></ul>

Criterion	Verification questions
1.2.2. Captions (recorded)	<ul style="list-style-type: none"> <li>• For pre-recorded video with audio: are captions provided for all content?</li> </ul>
1.2.3. Audio description or multi-media alternative versions (recorded)	<ul style="list-style-type: none"> <li>• For pre-recorded video (with or without audio): are a text transcript or audio description provided?</li> </ul>
1.2.4. Captions (live)	<ul style="list-style-type: none"> <li>• For live video with audio: are captions provided for all content?</li> </ul>
1.2.5. Audio description (recorded)	<ul style="list-style-type: none"> <li>• For pre-recorded video (with or without audio): is audio description provided?</li> </ul>
1.3.1. Information and relationships	<ul style="list-style-type: none"> <li>• Are form elements grouped where necessary?</li> <li>• Are the required input fields clearly identified?</li> <li>• Are headings properly marked using heading tags?</li> <li>• Does the document have a semantic structure?</li> <li>• Is the table structure correct?</li> <li>• Is informative content preserved when CSS is disabled?</li> </ul>
1.3.2. Meaningful sequence	<ul style="list-style-type: none"> <li>• Does content remain clear when CSS is disabled?</li> <li>• Are changes in reading order properly indicated?</li> </ul>
1.3.3. Sensory characteristics	<ul style="list-style-type: none"> <li>• Is information conveyed to users using means other than sensory characteristics?</li> </ul>
1.3.4. Orientation	<ul style="list-style-type: none"> <li>• Is content displayed regardless of screen orientation (portrait or landscape)?</li> </ul>
1.3.5. Purpose of input fields	<ul style="list-style-type: none"> <li>• Do input fields intended for personal user information include the autocomplete attribute?</li> </ul>
1.4.1. Use of colour	<ul style="list-style-type: none"> <li>• Is information conveyed to users using means other than colour?</li> </ul>
1.4.2. Audio control	<ul style="list-style-type: none"> <li>• If audio plays automatically for more than 3 seconds, is a mechanism provided to the users to control it?</li> </ul>
1.4.3. Contrast (minimum requirements)	<ul style="list-style-type: none"> <li>• Is there sufficient contrast between text colour and background colour?</li> <li>• Is contrast sufficient when text is embedded in images or the background is non-uniform?</li> <li>• Is the background-color attribute defined whenever the CSS color attribute is used, filled for each text?</li> </ul>
1.4.4. Resizing text	<ul style="list-style-type: none"> <li>• Does text remain readable when character size is increased to 200%?</li> </ul>
1.4.5. Text images	<ul style="list-style-type: none"> <li>• Ensure that images do not contain text that could be formatted using CSS styles.</li> </ul>
1.4.10. Scrolling in multiple directions	<ul style="list-style-type: none"> <li>• Is horizontal scrolling always absent when the browser window width is reduced to 320px?</li> </ul>

Criterion	Verification questions
1.4.11. Contrast of non-text elements	<ul style="list-style-type: none"> <li>• Is there sufficient contrast between the colours of interface components or graphic elements that convey information?</li> </ul>
1.4.12. Line spacing	<ul style="list-style-type: none"> <li>• Can users change text spacing properties without loss of content or functionality?</li> </ul>
1.4.13. Content on hover or focus	<ul style="list-style-type: none"> <li>• Can users control content that appears on hover or focus (e.g., tooltips)?</li> </ul>
2.1.1. Keyboard	<ul style="list-style-type: none"> <li>• Is all page functionality available through a keyboard interface?</li> </ul>
2.1.2. No keyboard trap	<ul style="list-style-type: none"> <li>• Does the page contain any keyboard traps?</li> </ul>
2.1.4. Shortcut keys	<ul style="list-style-type: none"> <li>• If single-key shortcuts are available, do they meet the required conditions?</li> </ul>
2.2.1. Time settings	<ul style="list-style-type: none"> <li>• Can users control time limits?</li> </ul>
2.2.2. Pause, stop, hide	<ul style="list-style-type: none"> <li>• If content on the page moves, is there a mechanism to pause, stop, hide it, or change the update frequency?</li> </ul>
2.3.1. Three flashed or below threshold	<ul style="list-style-type: none"> <li>• Does flashing or blinking not occur at a rate of three times per second or more within a defined area?</li> </ul>
2.4.1. Skipping elements	<ul style="list-style-type: none"> <li>• Is there a link that allows users to skip to the main content of the page?</li> </ul>
2.4.2. Page title	<ul style="list-style-type: none"> <li>• Does the page have an appropriate meta title?</li> </ul>
2.4.3. Focus order	<ul style="list-style-type: none"> <li>• Is the focus order of components logical and consistent?</li> </ul>
2.4.4. Link purpose (in context)	<ul style="list-style-type: none"> <li>• Is the purpose of each link clear from its context?</li> </ul>
2.4.5. Multiple search methods	<ul style="list-style-type: none"> <li>• Does the website provide at least two ways of navigation?</li> </ul>
2.4.6. Headings and labels	<ul style="list-style-type: none"> <li>• Do all input field labels meet the requirements?</li> <li>• Is information structured using appropriate headings?</li> <li>• Does each button have an appropriate label?</li> </ul>
2.4.7. Visible focus	<ul style="list-style-type: none"> <li>• Is there a visible focus indicator?</li> </ul>
2.4.9. Link purpose (link only)	<ul style="list-style-type: none"> <li>• Is the text of each link clear when read out of context?</li> </ul>
2.4.10. Section headings	<ul style="list-style-type: none"> <li>• Are there headings of appropriate levels to arrange the content?</li> </ul>
2.5.1. Gesture navigation	<ul style="list-style-type: none"> <li>• Is there an alternative for actions caused by multipoint gestures?</li> </ul>
2.5.2. Cancellation of cursor actions	<ul style="list-style-type: none"> <li>• Can a mistaken click or touch be cancelled?</li> </ul>

Criterion	Verification questions
2.5.3. Marking in the element name	<ul style="list-style-type: none"> <li>• Does the accessible name of interface components contain a visible label?</li> </ul>
2.5.4. Motion navigation	<ul style="list-style-type: none"> <li>• Is there an alternative for actions triggered by device motion or user movement?</li> </ul>
3.1.1. Page language	<ul style="list-style-type: none"> <li>• Is the main language of the document defined?</li> </ul>
3.1.2. Language of content parts	<ul style="list-style-type: none"> <li>• Are changes in the language clearly identified?</li> </ul>
3.2.1. On focus	<ul style="list-style-type: none"> <li>• Can users control changes of context when navigating using the keyboard or mouse?</li> </ul>
3.2.2. During input	<ul style="list-style-type: none"> <li>• Do users control context changes when modifying input parameters?</li> </ul>
3.2.3. Coordinated navigation	<ul style="list-style-type: none"> <li>• Are repeated website elements presented in the same order?</li> </ul>
3.2.4. Coordinated recognition	<ul style="list-style-type: none"> <li>• Are labels of interactive elements coordinated with other website pages?</li> </ul>
3.3.1. Error identification	<ul style="list-style-type: none"> <li>• Are the mistaken fields identified?</li> <li>• Are notifications of errors clear?</li> </ul>
3.3.2. Labels or instructions	<ul style="list-style-type: none"> <li>• Does each input field have a visible label?</li> <li>• Are users notified of the expected data format for input fields?</li> </ul>
3.3.3. Suggestions in case of errors	<ul style="list-style-type: none"> <li>• Are users provided with suggestions to fix errors?</li> </ul>
3.3.4. Error prevention	<ul style="list-style-type: none"> <li>• Do users have the ability to control their data in forms that require sensitive or personal information?</li> </ul>
4.1.1. Syntax	<ul style="list-style-type: none"> <li>• Is the source code correct?</li> </ul>
4.1.2. Name, role, value	<ul style="list-style-type: none"> <li>• Does each form field have an accessible name?</li> <li>• Does each frame have an appropriate title?</li> <li>• Are interface elements compatible with assistive technologies (i.e. accessible names, roles, and states are determined for all interactive elements)?</li> </ul>
4.1.3. Notification of status	<ul style="list-style-type: none"> <li>• Do screen readers announce status notifications?</li> </ul>

## Annex 3 to the Methodology.

### Mobile application accessibility assessment criteria

**Table 1.** Mobile application accessibility assessment criteria

Component	DSTU EN 301 549:2022 criterion
1. Sufficient text contrast	11.1.4.3
2. Scaling support	11.1.4.4
3. Accessible names for all interactive elements	11.4.1.2
4. Accessible roles for all interactive elements	11.4.1.2
5. Accessible states for all interactive elements	11.4.1.2
6. Accessible labels for input fields	11.3.3.2, 11.4.1.2
7. Accessible notifications of successful actions or errors	11.4.1.3
8. Correct focus order for assistive technologies	11.2.4.3
9. Ability to navigate using simple gestures	11.2.5.1
10. Programmatic determination of screen and section headings	11.1.3.1, 11.2.4.6

## Annex 4 to the Methodology.

### Monitoring reporting form

#### I. General information

Reporting period from:	
Reporting period to (inclusive):	
Number of websites (basic assessment)	
Number of websites (in-depth assessment)	
Number of mobile applications	

#### II. Websites/mobile applications, indicator components and their scores

**Table 1.** Basic website assessment

Website	C1	C2	C3	C4	C5	C6	C7	C8	C9	C10	Basic accessibility
(site.gov.ua)											

**Table 2.** In-depth website assessment

Website	Compliance assessment	Compliance level
(site.gov.ua)		

**Table 3.** Basic accessibility assessment of mobile applications

Application	1	2	3	4	5	6	7	8	9	10	Basic accessibility
(Application name)											

**III. List of indicator components not achieved and recommendations for addressing the causes of non-achievement:**

- indicator;
- code and name of the component;
- recommendations for addressing the causes of non-achievement of the component.

