

# Wiltshire Pension Fund

## Accessibility Assessment Report

27th February 2024

Accessibility  
Services

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# Introduction

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

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

## Executive Summary

This report documents the outcomes of the accessibility audit on the Wiltshire Pension Fund website carried out by Shaw Trust Accessibility Services, 25 January 2024. The website was evaluated against the W3C Web Content Accessibility Guidelines (WCAG) 2.1 up to conformance level AA (see [Web Content Accessibility Guidelines](#) for details). Automated evaluation tools and manual testing by an experienced in-house pan-disabled testing team were utilised to complete a comprehensive accessibility audit (see [Methodology](#) for details).

The Wiltshire Pension Fund website met 5 of the 25 (20%) applicable success criteria required for level A conformance and 7 of the 18 (39%) applicable success criteria required for level AA conformance.

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

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

# Web Content Accessibility Guidelines

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

## Web Content Accessibility Guidelines 2.1

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

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

**Level A** – Lowest success criteria

**Level AA** – Intermediate success criteria

**Level AAA** – Highest success criteria

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

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

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

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

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

# Methodology

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

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

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

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

## Scope

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

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

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

## Technical Testing

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

# Manual User Testing

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

- **Keyboard Only User**

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

- **Voice Activation User**

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

- **Screen Reader User**

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

- **Low Vision User**

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

- **Colour Blind User**

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

- **Deaf or Hard of Hearing User**

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

- **Learning Difficulties User**

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

Note: Testers may have a combination of disabilities.

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

# Audit Details

## Client Details

<b>Organisation</b>	Wiltshire Pension Fund	
<b>Primary Contact</b>	<b>Name</b>	Krystie Waterhouse Communications and Customer Engagement Manager
	<b>Position</b>	Customer Engagement Manager
	<b>Email</b>	<a href="mailto:krystie.waterhouse@wiltshire.gov.uk">krystie.waterhouse@wiltshire.gov.uk</a>

## Provider Details

<b>Organisation</b>	Shaw Trust Accessibility Services	
<b>Primary Contact</b>	<b>Name</b>	Graham Rees-Evans
	<b>Position</b>	Technical Account Manager
	<b>Email</b>	<a href="mailto:accessibility-services@shaw-trust.org.uk">accessibility-services@shaw-trust.org.uk</a>

## Testing Details

<b>Type</b>	Website	
<b>URL</b>	<a href="http://www.wiltshirepensionfund.org.uk">www.wiltshirepensionfund.org.uk</a>	
<b>Name</b>	Wiltshire Pension Fund Website	
<b>Description</b>	Website part of the national Local Government Pension Scheme (LGPS).	
<b>Primary Language</b>	English	
<b>Testing Type</b>	Assessment	
<b>Testing Environment</b>	Windows 10 Google Chrome / Microsoft Edge JAWS 2020 / NVDA 2019 / ZoomText 2019 / Dragon Professional 15	
<b>Testing Team</b>	Alan Sleat Imran Akhtar Thomas Harrison Lee Ellery	Screen Reader Screen Reader Screen Reader Keyboard Only



	Rupi Phullar Darren Hardman Sam Hopkins Steve Evans Adam Armstrong William Treharne	Keyboard Only Deaf Low Vision & Colour Low Vision & Colour Learning Difficulties Hard of Hearing
<b>Technical Analyst</b>	Lianne Richards	
<b>Technical Consultant</b>	Graham Rees-Evans	
<b>Quality Assurance</b>	Graham Rees-Evans	
<b>Date Tested</b>	25/01/2024	
<b>Date Report Issued</b>	27/02/2024	

# Audit Results

# Results Summary

# Priority A Results

Issue(s) Ref	Success Criterion	Current Results
STAS-F04/F05/F07/ F09/F12/F14/F17	1.1.1 Non-text Content	FAIL
STAS-F14	1.2.1 Prerecorded Audio-only and Video-only	FAIL
STAS-F14	1.2.2 Captions (Prerecorded)	FAIL
STAS-F13/F14	1.2.3 Audio Description or Media Alternative (Prerecorded)	FAIL
STAS-F02/F03/F04/ F07/F08/F10/F11/ F17	1.3.1 Info and Relationships	FAIL
	1.3.2 Meaningful Sequence	PASS
STAS-F15	1.3.3 Sensory Characteristics	FAIL
STAS-F15	1.4.1 Use of Colour	FAIL
STAS-F12	1.4.2 Audio Control	FAIL
STAS-F12	2.1.1 Keyboard	FAIL
	2.1.2 No Keyboard Trap	PASS
	2.1.4 Character Key Shortcuts	N/A
STAS-F16	2.2.1 Timing Adjustable	FAIL
STAS-F12	2.2.2 Pause, Stop, Hide	FAIL
	2.3.1 Three Flashes or Below Threshold	N/A
STAS-F01/F10	2.4.1 Bypass Blocks	FAIL
STAS-F17	2.4.2 Page Titled	FAIL
	2.4.3 Focus Order	PASS
STAS-F08	2.4.4 Link Purpose (In Context)	FAIL
	2.5.1 Pointer Gestures	N/A
	2.5.2 Pointer Cancellation	N/A
STAS-F04	2.5.3 Label in Name	FAIL
	2.5.4 Motion Actuation	N/A
STAS-F17	3.1.1 Language of Page	FAIL
	3.2.1 On Focus	PASS
	3.2.2 On Input	PASS
STAS-F06	3.3.1 Error Identification	FAIL
STAS-F04/F05/F07/ F12	3.3.2 Labels or Instructions	FAIL
STAS-F18	4.1.1 Parsing	FAIL
STAS-F04/F05/F07/ F18	4.1.2 Name, Role, Value	FAIL
Total		30
Non-Applicable		05
Compliant (Pass)		05
Non-Compliant (Fail)		20

## Priority AA Results

Issue(s) Ref	Success Criterion	Current Results
	1.2.4 Captions (Live)	N/A
STAS-F13	1.2.5 Audio Description (Prerecorded)	FAIL
	1.3.4 Orientation	PASS
STAS-F04/F05/F07	1.3.5 Identify Input Purpose	FAIL
STAS-F19	1.4.3 Contrast (Minimum)	FAIL
STAS-F20/F22	1.4.4 Resize Text	FAIL
STAS-F22	1.4.5 Images of Text	FAIL
STAS-F21	1.4.10 Reflow	FAIL
STAS-F19	1.4.11 Non-text Contrast	FAIL
	1.4.12 Text Spacing	PASS
	1.4.13 Content on Hover or Focus	PASS
	2.4.5 Multiple Ways	PASS
STAS-F02/F03	2.4.6 Headings and Labels	FAIL
	2.4.7 Focus Visible	PASS
	3.1.2 Language of Parts	N/A
	3.2.3 Consistent Navigation	PASS
	3.2.4 Consistent Identification	PASS
STAS-F06	3.3.3 Error Suggestion	FAIL
STAS-F06	3.3.4 Error Prevention (Legal, Financial, Data)	FAIL
STAS-F06	4.1.3 Status Messages	FAIL
	Total	20
	Non-Applicable	02
	Compliant (Pass)	07
	Non-Compliant (Fail)	11

# Issues

#	Ref	Issue	Level	WCAG References
1	STAS-F01	Non-Functioning 'Skip' Navigation	A	2.4.1
2	STAS-F02	Incorrect Heading Structure	A/AA	1.3.1, 2.4.6
3	STAS-F03	Empty Headings	A/AA	1.3.1, 2.4.6
4	STAS-F04	Unlabelled Form Fields	A/AA	1.1.1, 1.3.1, 1.3.5, 2.5.3, 3.3.2, 4.1.2
5	STAS-F05	Missing Notification of Mandatory Form Fields	A/AA	1.1.1, 1.3.5, 3.3.2, 4.1.2
6	STAS-F06	Form Error Handling	A/AA	3.3.1, 3.3.3, 3.3.4, 4.1.3
7	STAS-F07	Ambiguous Button Labelling	A/AA	1.1.1, 1.3.1, 1.3.5, 3.3.2, 4.1.2
8	STAS-F08	Non-Descriptive Link Text	A	1.3.1, 2.4.4
9	STAS-F09	Non-Descriptive Alt Text	A	1.1.1
10	STAS-F10	Untitled Frames	A	1.3.1, 2.4.1
11	STAS-F11	Incorrect Table coding	A	1.3.1
12	STAS-F12	Video Controls Inaccessible via Screen Reader	A	1.1.1, 1.4.2, 2.1.1, 2.2.2, 3.3.2
13	STAS-F13	Video missing Audio Description	A/AA	1.2.3, 1.2.5
14	STAS-F14	Video and Audio missing Text Alternatives	A	1.1.1, 1.2.1, 1.2.2, 1.2.3
15	STAS-F15	Conveying Information using colour alone	A	1.4.1, 1.3.3
16	STAS-F16	Users unaware of Time Limit	A/AA	2.2.1, 20
17	STAS-F17	Inaccessible Non-HTML Documents	A	1.1.1, 1.3.1, 2.4.2, 3.1.1
18	STAS-F18	HTML Markup Errors	A	4.1.1, 4.1.2
19	STAS-F19	Insufficient Colour Contrast	AA	1.4.3, 1.4.11
20	STAS-F20	Obscured Text	AA	1.4.4

#	Ref	Issue	Level	WCAG References
21	STAS-F21	Responsive Design	AA	1.4.10
22	STAS-F22	Text does not resize	AA	1.4.4, 1.4.5

# Priority A Issues



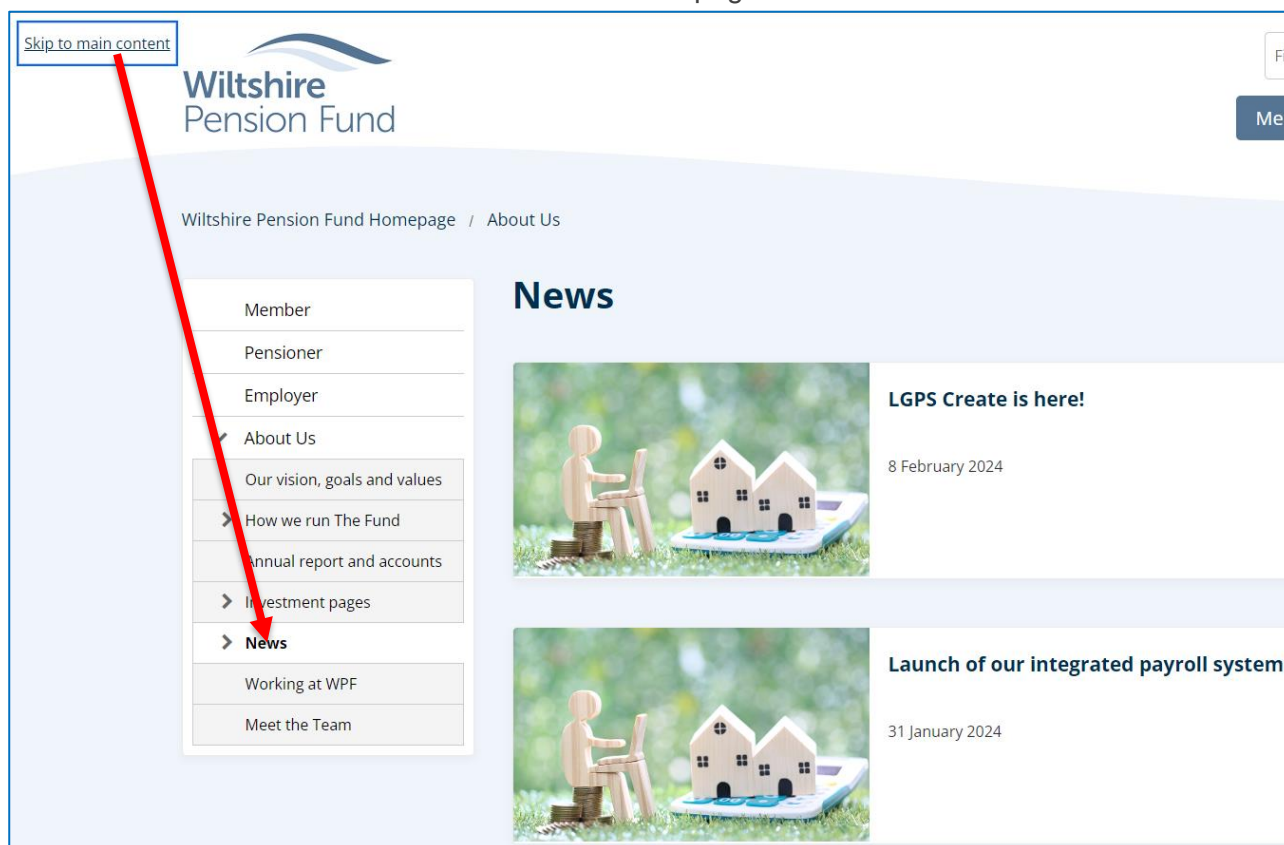
# STAS-F01: Non-Functioning 'Skip' Navigation

## Description

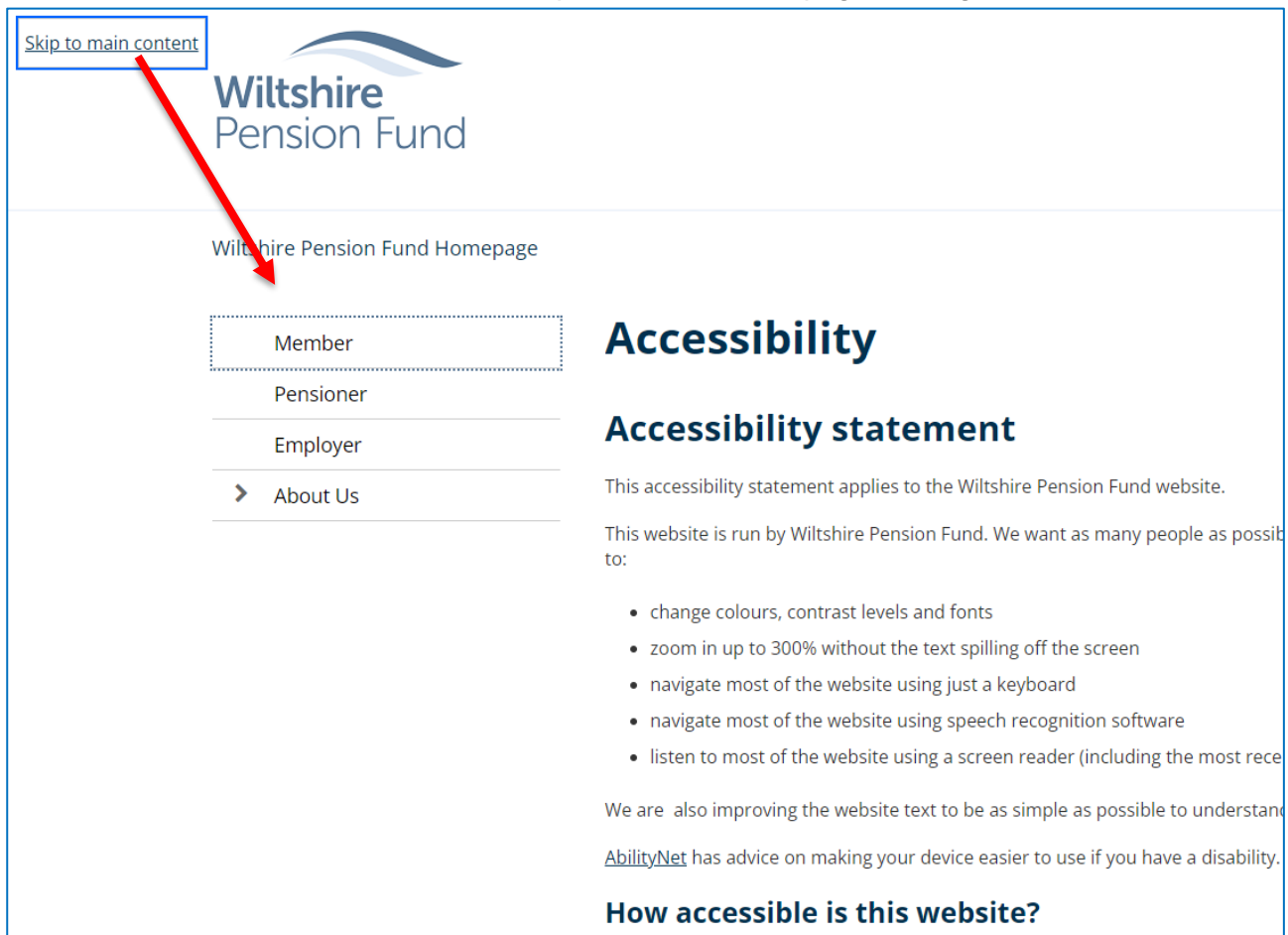
The purpose of skip navigation is to provide a mechanism to bypass blocks of material that are repeated on multiple web pages by skipping directly to the main content of the web page. One of the first interactive items on a web page should be a link to the beginning of the main content. Activating the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

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

When activating the 'Skip to content' link on the 'News' page the focus lands on the 'News' link in the sidebar menu and not on the main content of the page.



When activating the 'Skip to content' link on the 'Accessibility' page the focus lands just above the sidebar menu and not on the main content of the page. This issue where the user's focus is taken to the side menu and not the main content present on several pages throughout the site.



The screenshot shows the Wiltshire Pension Fund homepage. At the top left, there is a link labeled "Skip to main content" enclosed in a blue box. A red arrow points from this link down to the "Member" link in the sidebar menu. The sidebar menu includes links for "Member", "Pensioner", "Employer", and "About Us". To the right of the sidebar, the main content area features a heading "Accessibility" and a sub-heading "Accessibility statement". Below the sub-heading, there is text stating that the accessibility statement applies to the website and a list of features: change colours, contrast levels and fonts; zoom in up to 300% without the text spilling off the screen; navigate most of the website using just a keyboard; navigate most of the website using speech recognition software; and listen to most of the website using a screen reader. At the bottom of the screenshot, there is a heading "How accessible is this website?".

## User Comments

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

Kevin James  
Keyboard Only Assessor

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

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

Alan Sleat  
Screen Reader Assessor

## Occurrences

This issue occurs throughout the site.

## Example Occurrences

<https://wiltshirepensionfund.org.uk/News#maincontent>

<https://wiltshirepensionfund.org.uk/article/3725/Accessibility#maincontent>

<https://wiltshirepensionfund.org.uk/Our-vision-goals-and-values>

<https://www.wiltshirepensionfund.org.uk/About-us#maincontent>

<https://member.wiltshirepensionfund.org.uk/article/6515/Financial-Advisors-and-other-Third-Parties#maincontent>

## Action Required

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

## WCAG References

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

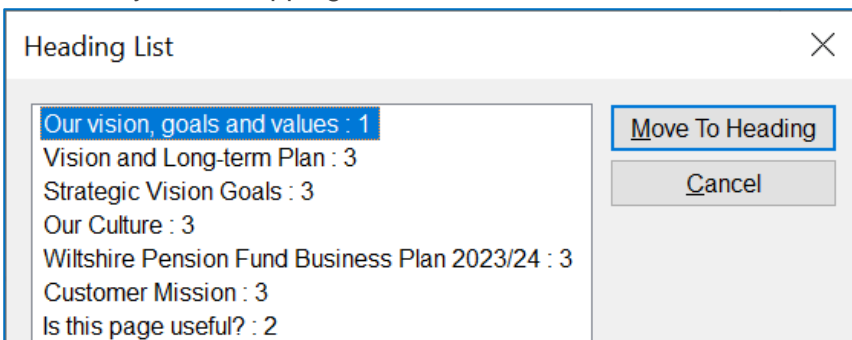
# STAS-F02: Incorrect Heading Structure

## Description

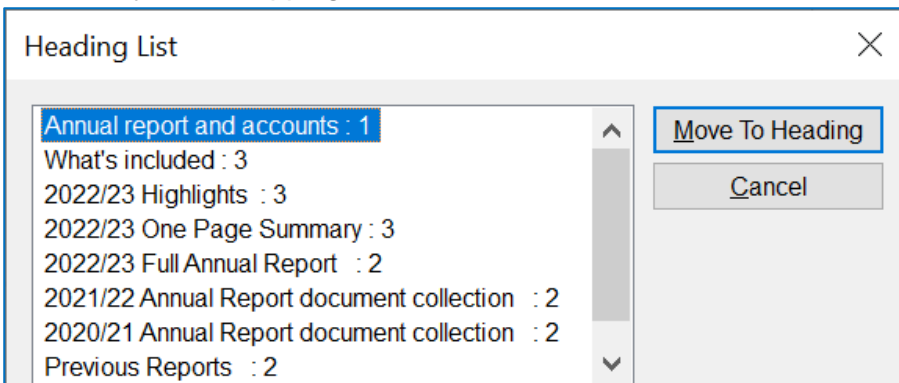
Screen reader and other assistive technology users have the ability to navigate web pages by heading structure. This means that the user can read or jump directly to top level elements (<h1>), next level elements (<h2>), third level elements (<h3>), and so on. Viewing or listening to this outline should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

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

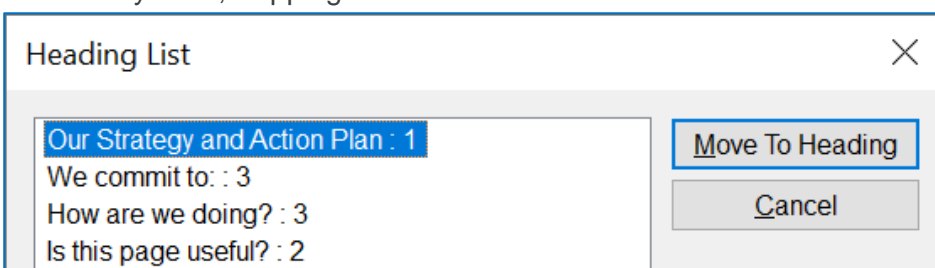
On the 'Our vision, goals and values' page, there is an illogical heading structure. The H1 is followed by a H3, skipping the H2.



On the 'Annual report and accounts' page, there is an illogical heading structure. The H1 is followed by a H3, skipping the H2.



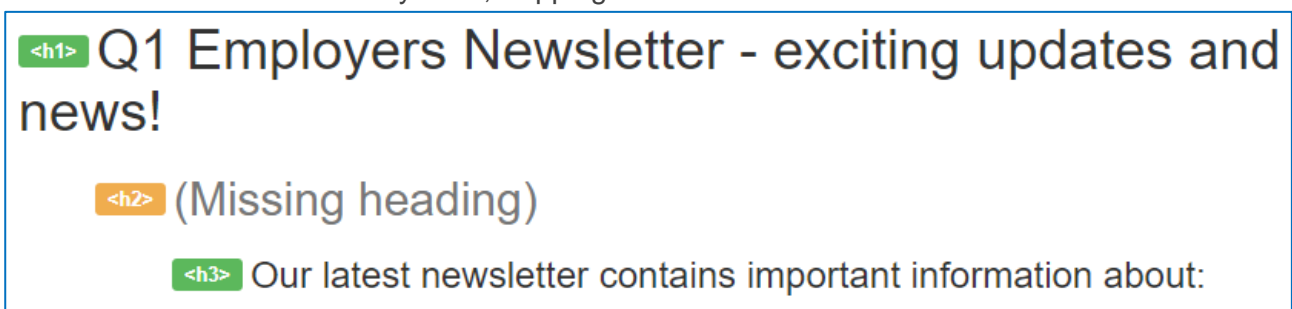
On the 'Our Strategy and Action Plan' page, there is an illogical heading structure. The H1 is followed by a H3, skipping the H2.



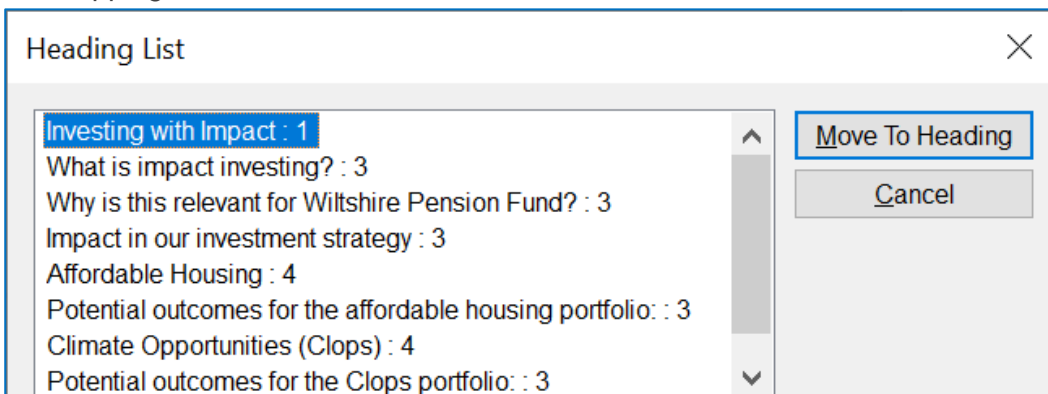
On the 'Meet the Team' page, there is an illogical heading structure. The H1 is followed by a H3, skipping the H2.



On the 'Q1 Employers Newsletter - exciting updates and news!' page, there is an illogical heading structure. The H1 is followed by a H3, skipping the H2.



On the 'Investing with Impact' page, there is an illogical heading structure. The H1 is followed by a H3, skipping the H2.



## User Comments

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

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

Alan Sleat  
Screen Reader Assessor

# Occurrences

This issue occurs throughout the site.

## Example Occurrences

<https://wiltshirepensionfund.org.uk/Our-vision-goals-and-values>  
<https://www.wiltshirepensionfund.org.uk/Annual-report-and-accounts>  
<https://www.wiltshirepensionfund.org.uk/Our-Strategy-and-Action-Plan>  
<https://www.wiltshirepensionfund.org.uk/Meet-the-team>  
<https://www.wiltshirepensionfund.org.uk/Q1-2024-Employers-Newsletter>  
<https://www.wiltshirepensionfund.org.uk/Investing-with-Impact>

## Action Required

1. Ensure that all pages contain a heading 1.
2. Ensure that all heading on a page follow a logical structure.
3. Ensure that the heading structure represents the information structure of the page
4. Where widget or component elements contain a heading structure, ensure that the heading structure remains logical wherever the component is used

## WCAG References

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

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

## Further Information

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

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

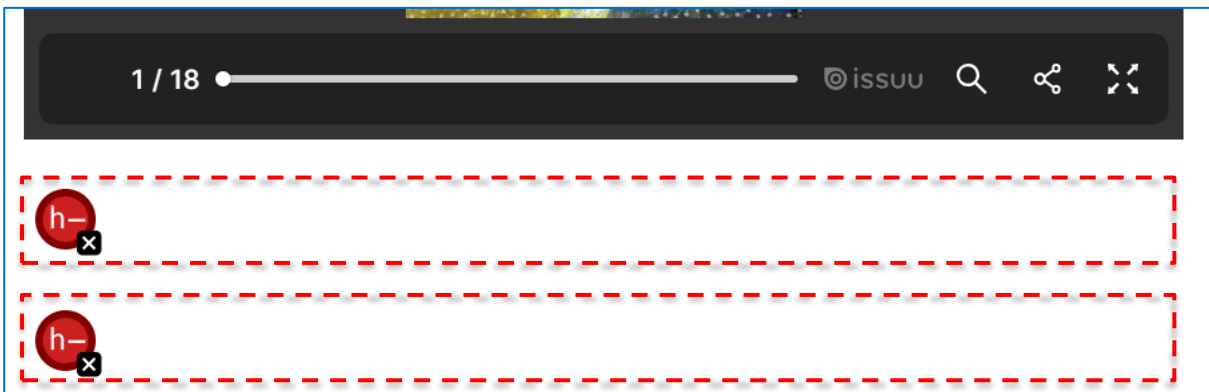
# STAS-F03: Empty Headings

## Description

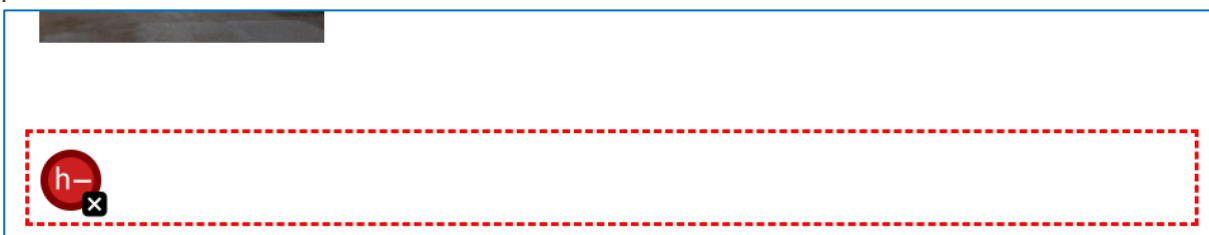
Screen reader and other assistive technology users have the ability to navigate web pages by structure. This means that the user can read or jump directly to top level elements (<h1>), next level elements (<h2>), third level elements (<h3>), and so on. Viewing or listening to this outline should give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

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

On the 'Responsible Investment and Stewardship Report' page, there are 2 empty headings present.



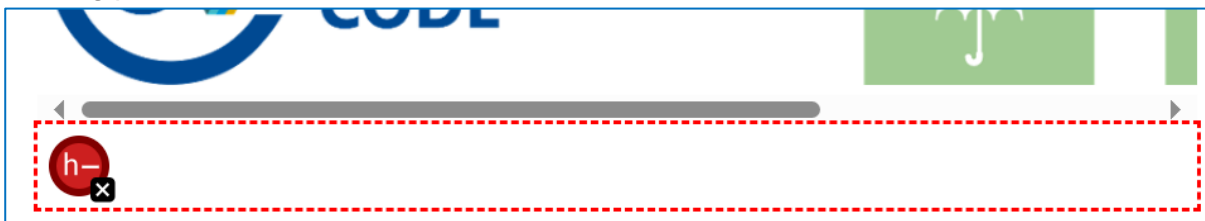
On the 'Adopter of the Impact Investing Principles for Pensions' page, there is an empty heading present.



On the 'Annual report and accounts' page, there is an empty heading present.



On the 'Responsible Investment and Stewardship Highlights of 2022/23' page, there is an empty heading present.



On the 'The cost-of-living crisis, and the impact on WPF' page, there is an empty heading present.



## User Comments

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

Alan Sleat  
Screen Reader Assessor

## Occurrences

This issue occurs throughout the site.



## Example Occurrences

<https://www.wiltshirepensionfund.org.uk/article/6192/Responsible-Investment-and-Stewardship-Report>

<https://www.wiltshirepensionfund.org.uk/Adopter-of-the-Impact-Investing-Principles-for-Pensions>

<https://www.wiltshirepensionfund.org.uk/Annual-report-and-accounts>

<https://www.wiltshirepensionfund.org.uk/Stewardship-Highlights-2023>

<https://www.wiltshirepensionfund.org.uk/Cost-of-living-crisis>

## Action Required

1. Ensure that all headings contain content.

## WCAG References

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

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

## Further Information

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

`<h1>Disaster preparation</h1>`

Correct

`<h1> </h1>`

Incorrect

# STAS-F04: Unlabelled Form Fields

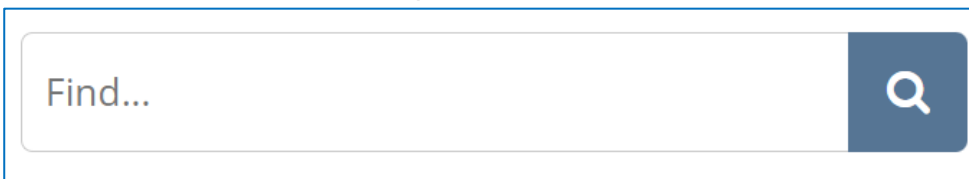
## Description

Providing a descriptive form field label will allow users to know what information to enter in a form field. Where a series of form fields relate to similar information, the context of the form fields needs to be included in the field description. If Radio buttons and Checkboxes allow users to make selections from a set of options, they should be enclosed with a fieldset; this will allow users of assistive technology to be aware that the options presented relate to a group.

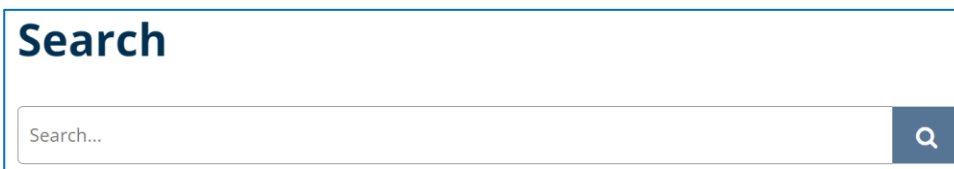
Some users will disable CSS, or apply their own style sheets to remove any background images or colours, to simplify the look of text to improve readability of the content. When the CSS is disabled, elements become visible that otherwise might be hidden from view.

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

On the 'Search' page there are 2 form fields where the ARIA control has no label. A label (or name) linked to the control allows screen readers to voice the label correctly when reading the control. This 'Find' field issue is present across the site.



```
<div id="headkeywords_input_container" role="combobox" aria-expanded="false" aria-owns="headkeywords_input_suggestions" aria-haspopup="listbox">...</div> == $0
```



```
<div id="keywords_input_container" role="combobox" aria-expanded="false" aria-owns="keywords_input_suggestions" aria-haspopup="listbox">...</div> == $0
```

## User Comments

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

Alan Sleat  
Screen Reader Assessor

# Occurrences

This issue occurs throughout the site.

## Example Occurrences

<https://www.wiltshirepensionfund.org.uk/article/3126/Search>

<https://www.wiltshirepensionfund.org.uk/Climate-Summary>

<https://www.wiltshirepensionfund.org.uk/Voting>

<https://www.wiltshirepensionfund.org.uk/article/6768/Wiltshire-Pension-Fund-shortlisted-for-an-award-for-our-climate-change-strategy>

<https://www.wiltshirepensionfund.org.uk/We-are-now-starting-our-backlogs-project>

## Action Required

1. Ensure that all form fields are labelled clearly and have correctly associated label tags.
2. Ensure fieldsets and legends are used correctly where appropriate.
3. For grid elements, aria-labelledby can be used to link the grid with the ID of a suitable descriptive element, e.g. a caption

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

## WCAG References

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

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

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

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

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

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

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

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

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

## Further Information

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

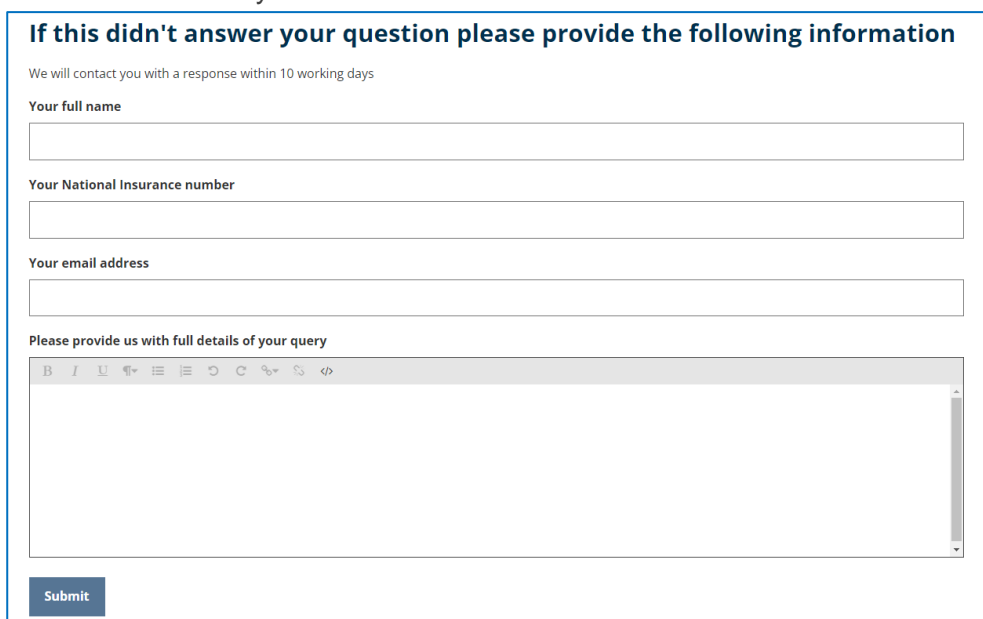
```
<form action="demo_form.asp">
  <label for="male">Male</label>
  <input type="radio" name="gender" id="male" value="male"><br>
  <label for="female">Female</label>
  <input type="radio" name="gender" id="female" value="female"><br>
  <label for="other">Other</label>
  <input type="radio" name="gender"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

# STAS-F05: Missing Notification of Mandatory Form Fields

## Description

Providing a user with a clear indication of which form fields are mandatory will improve the accuracy of form data.

When viewing the 'Active - Change in Circumstances' page, there is no indication that any of the fields are mandatory.



**If this didn't answer your question please provide the following information**

We will contact you with a response within 10 working days

Your full name

Your National Insurance number

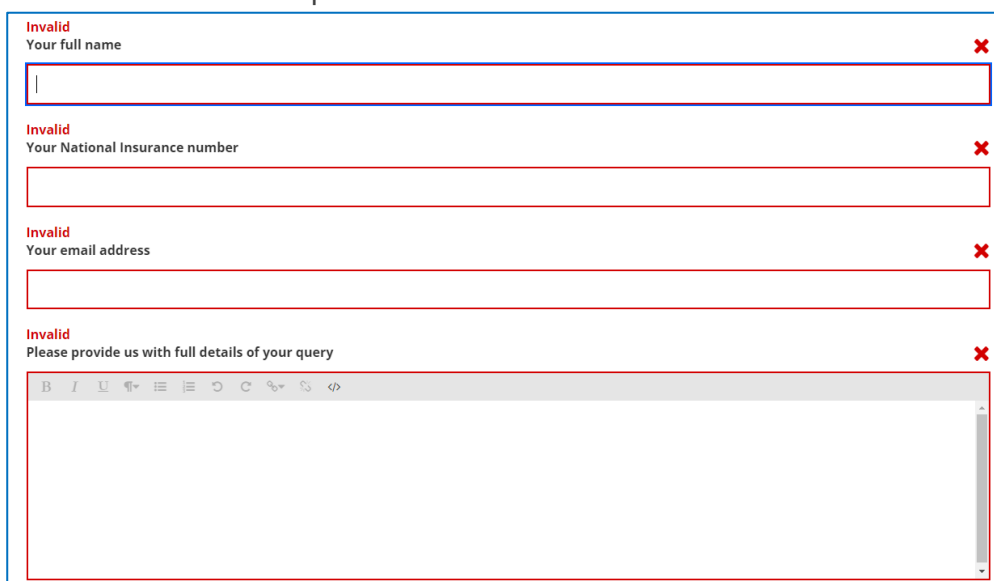
Your email address

Please provide us with full details of your query

B I U

Submit

However, when the form is submitted without the required fields, an error message appears asking the user to enter the required information.



**Invalid**  
Your full name ✖

**Invalid**  
Your National Insurance number ✖

**Invalid**  
Your email address ✖

**Invalid**  
Please provide us with full details of your query ✖

B I U

There seems to be mandatory fields, but these are not indicated to the user.

When viewing the 'Customer Service' page, there is no indication that any of the fields are mandatory.

Please provide the following information and we will contact you with a response within 10 working days.

**Your full name**

**Your National Insurance number**

**Your email address**

**Your telephone number (optional)**

**Please provide us with full details of your query**

B I U ↵ ☰ ☷ ↺ ↻ 🔍 </>

---

**Submit**

However, when the form is submitted without the required fields, an error message appears asking the user to enter the required information.

**Invalid**  
Your full name ✘

**Invalid**  
Your National Insurance number ✘

**Invalid**  
Your email address ✘

Your telephone number (optional)

**Invalid**  
Please provide us with full details of your query ✘

B I U ↵ ☰ ☷ ↺ ↻ 🔍 </>

---

There seems to be mandatory fields, but these are not indicated to the user.

When viewing the 'Transfer in online form' page, there is no indication that any of the fields are mandatory.

## Transferring In Your Previous Pension Benefits

This form sets out the process for transferring pension rights both public sector and private sector into the Wiltshire Pension Fund. This should not be completed if you have a previous pension benefit with another LGPS fund. Please read under the heading 'Important' if you have a previous pension benefits with another LGPS fund.

**Your Personal Details**

Name  National Insurance number  Your email address

Who are you employed by in the Wiltshire Pension Fund?

**Important**

- Any transfer of benefits into Wiltshire Pension Fund must be applied for within 12 months of joining the scheme
- If you are moving between employers in the Wiltshire Pension Fund you do not need to complete a transfer form and we will contact you separately regarding your options

[Next >](#)

However, when the form is submitted without the required fields, an error message appears asking the user to enter the required information.

**Your Personal Details**

Please enter your full name  **×** Please enter a valid National Insurance number  **×** Please enter your full name  **×**

Name  National Insurance number  Your email address

Please enter the name of your employer

Who are you employed by in the Wiltshire Pension Fund?  **×**

There seems to be mandatory fields, but these are not indicated to the user.

These issues occur on multiple forms throughout the site.

## User Comments

"Fields that are mandatory, but not indicated will frustrate a Screen Reader User. I could not find any mandatory field indications on this site. As a result, I had to return to the field to enter the required information. Notifications to mandatory fields will save time and insure you get the relevant details needed to carry out the request. Mandatory fields are normally indicated by, a '\*', or the field having an announcement within it."

Alan Sleat  
Screen Reader Assessor

# Occurrences

This issue occurs throughout the site.

## Example Occurrences

<https://member.wiltshirepensionfund.org.uk/article/4660>

<https://member.wiltshirepensionfund.org.uk/article/4666>

<https://member.wiltshirepensionfund.org.uk/Transfer-in-online-form>

<https://member.wiltshirepensionfund.org.uk/article/4664/>

<https://member.wiltshirepensionfund.org.uk/article/4663/Leaving-OptOut>

## Action Required

1. Ensure mandatory fields are indicated to users prior to submission.
2. Ensure the purpose on any symbols used to denoted mandatory fields is explained to users.

## WCAG References

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

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

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

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

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

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

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



## Further Information

Marking mandatory form fields is important to indicate to users what is necessary to complete a form. An asterisk is the common signal for a mandatory field, the code to create mandatory fields can be seen below:

```
<form action="demo_form.asp">  
  *Username: <input type="text" name="username" required>  
  <input type="submit">  
</form>
```

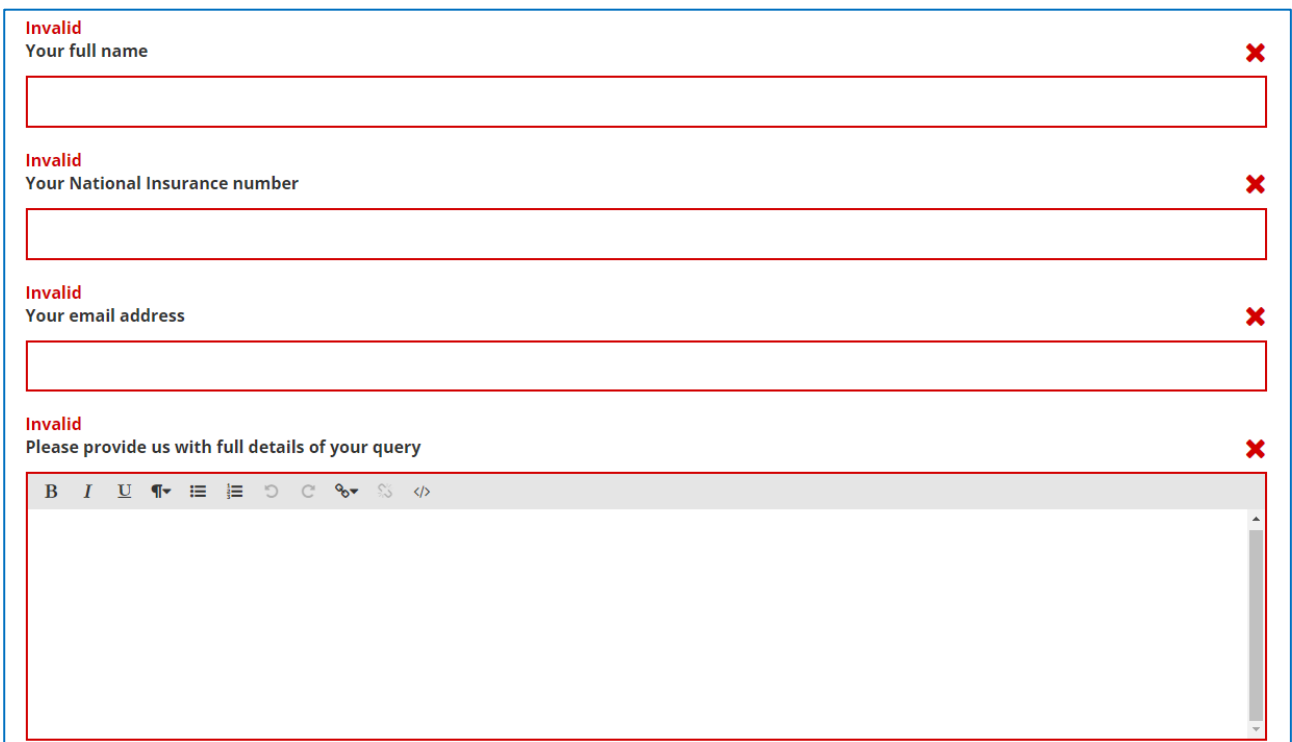
# STAS-F06: Form Error Handling

## Description

When a user makes an error when submitting data to a form, the user should firstly be informed that they have made an error and secondly where the errors are located. This is especially important for screen reader users who will be unaware of any visual indication that there are input errors.

Errors with form submission should not rely solely on visual cues.

When submitting the 'Active - Change in Circumstances' form, the users focus returns to the first field with an error and not a list of errors or an error notification.

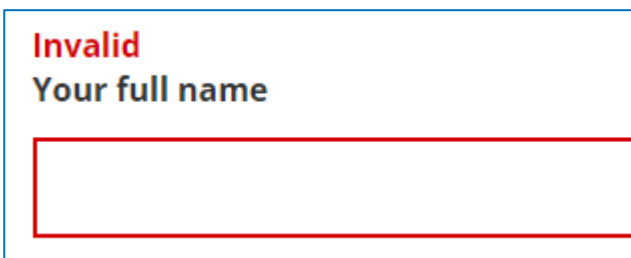


The screenshot shows a form with four input fields, each with an error message and a red 'X' icon:

- Invalid**  
Your full name
- Invalid**  
Your National Insurance number
- Invalid**  
Your email address
- Invalid**  
Please provide us with full details of your query

The fourth field is a rich text editor with a toolbar containing icons for Bold (B), Italic (I), Underline (U), Bulleted List, Numbered List, Undo, Redo, Link, Unlink, and Source Code.

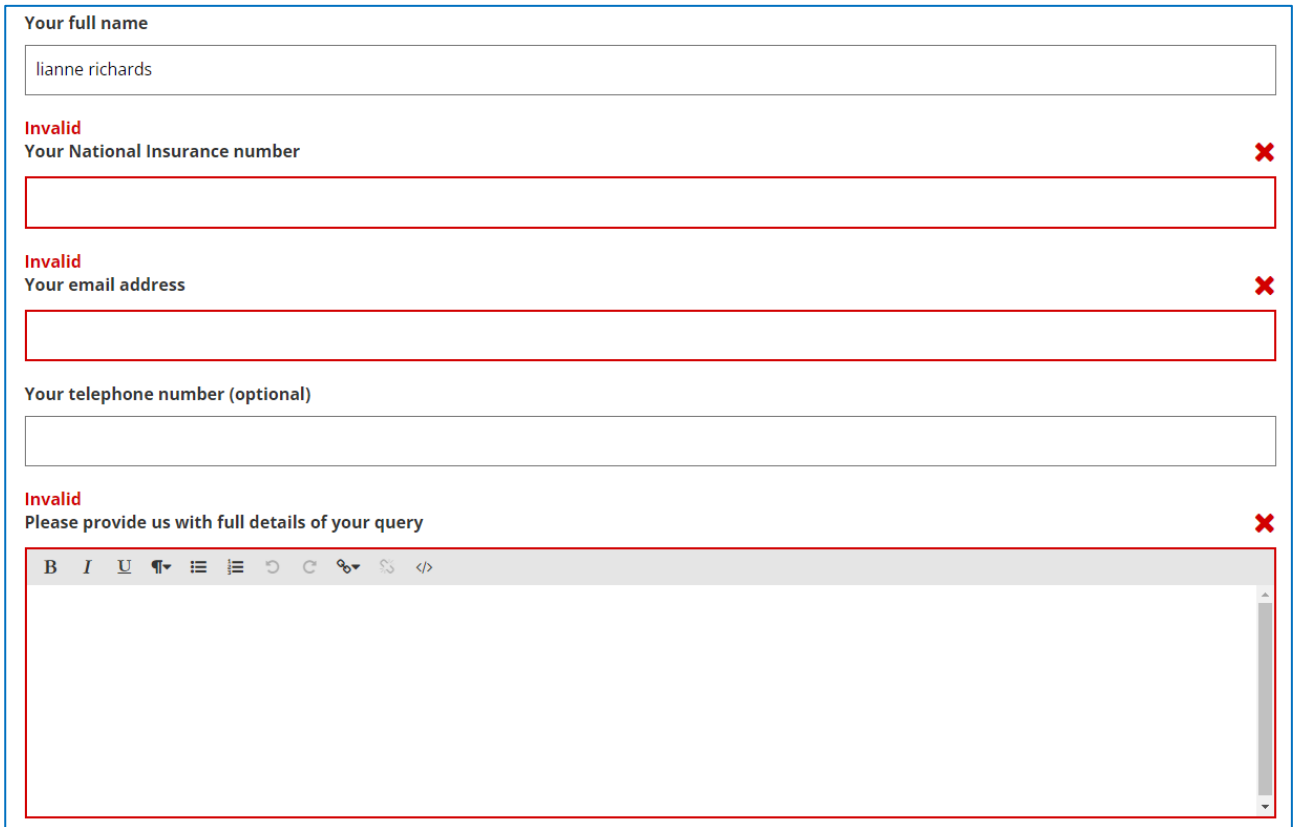
Each field shows an error with the text 'Invalid'. This does not inform the user what the error is or how to fix it.



The close-up shows the error message for the 'Your full name' field:

**Invalid**  
Your full name

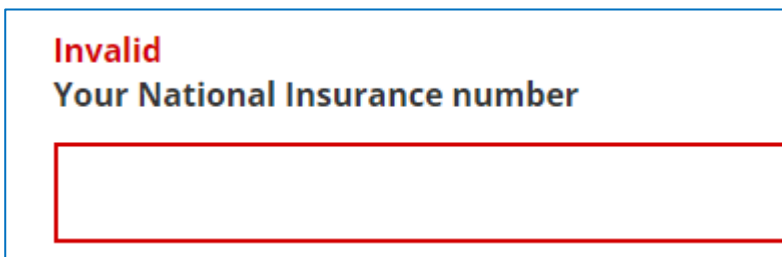
When submitting the 'Customer Service' form, the users focus returns to the first field with an error and not a list of errors or an error notification.



The screenshot shows a form with the following fields and error messages:

- Your full name**: Input field containing "lianne richards".
- Your National Insurance number**: Input field with an error message "Invalid" and a red 'X' icon.
- Your email address**: Input field with an error message "Invalid" and a red 'X' icon.
- Your telephone number (optional)**: Input field.
- Please provide us with full details of your query**: Text area with an error message "Invalid" and a red 'X' icon.

Each field shows an error with the text 'Invalid'. This does not inform the user what the error is or how to fix it.



The close-up shows the error message for the National Insurance number field:

**Invalid**  
**Your National Insurance number**

These issues occur on multiple forms throughout the site.

## User Comments

“When there is no error message, the form was not submitted; which, in turn, left the screen reader user wondering if the form was working, or not, as they had spent time carefully filling out the form. In the event that a person has either missed a mandatory field, or made an error to the information given, a 'Handling Error' message should alert the person on submission.

The result will be that the user will not know what error has been made that has prevented the information to be submitted, and quickly resolve the matter.

If there has been an error in filling in information within a form, or search, being directed to that error will not only save time but give confidence that the site will have all the details necessary to complete their enquiry.

The most effective method of telling someone of an error is by having a heading, which the person has been directed to, which clearly locates the error; and they can then quickly navigate to it and change it. The result is that, even though they have made an error, it is quickly rectified. Another option is that the person is taken directly to the field that has an error, which is good if there is only one error evident. However, if there is more than one, then the person will have to try and 'Submit' it again, for the page to tell them they have another error, which will take much longer than having a list of errors, as suggested previously."

Alan Sleat  
Screen Reader Assessor

## Occurrences

This issue occurs throughout the site.

## Example Occurrences

<https://member.wiltshirepensionfund.org.uk/article/4660>

<https://member.wiltshirepensionfund.org.uk/article/4666>

<https://member.wiltshirepensionfund.org.uk/article/4664/>

<https://member.wiltshirepensionfund.org.uk/article/4663/Leaving-OptOut>

<https://member.wiltshirepensionfund.org.uk/article/6515/Financial-Advisors-and-other-Third-Parties>

## Action Required

1. Ensure that users are informed that an error has occurred.
2. Provide a user with a list of where the errors occur.
3. Provide the user with additional help on how to fix the errors.
4. Ensure that any additional help provided is linked to the field, for example with the use of aria-described by
5. Ensure that the users focus is moved to a convenient place to help them make any corrections. Either to the first error listed, or the first field with an error.

## WCAG References

**3.3.1 Error Identification:** If an input error is automatically detected, the item that is in error is identified and the error is described to the user in text. (Level A)

**3.3.3 Error Suggestion:** If an input error is automatically detected and suggestions for correction are known, then the suggestions are provided to the user, unless it would jeopardize the security or purpose of the content. (Level AA)

**3.3.4 Error Prevention (Legal, Financial, Data):** For Web pages that cause legal commitments or financial transactions for the user to occur, that modify or delete user-controllable data in data storage systems, or that submit user test responses, at least one of the following is true: (Level AA)

- **Reversible:** Submissions are reversible.
- **Checked:** Data entered by the user is checked for input errors and the user is provided an opportunity to correct them.
- **Confirmed:** A mechanism is available for reviewing, confirming, and correcting information before finalizing the submission.

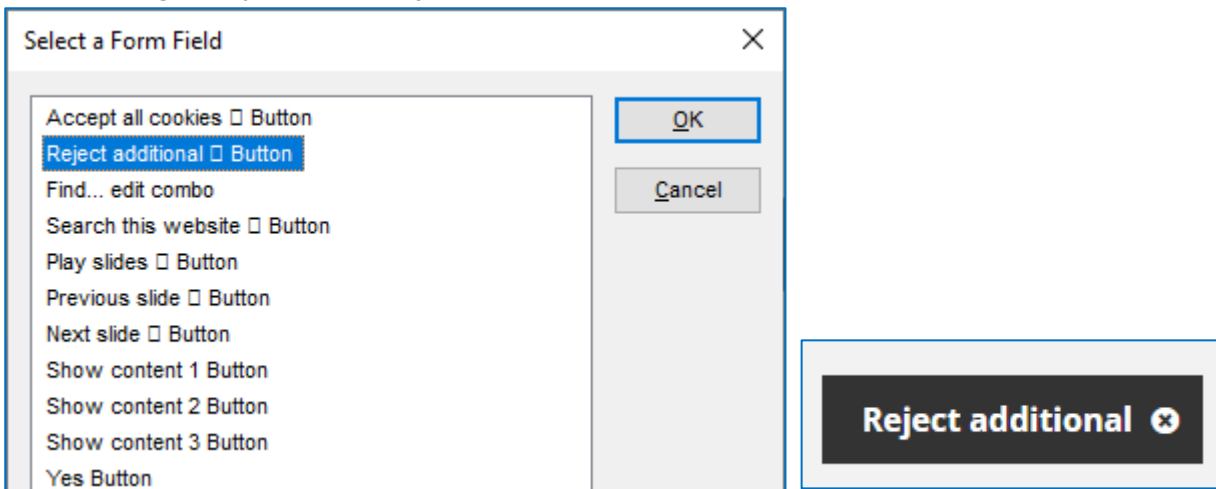
**4.1.3 Status Messages:** In content implemented using markup languages, status messages can be programmatically determined through role or properties such that they can be presented to the user by assistive technologies without receiving focus. (Level AA)

# STAS-F07: Ambiguous Button Labelling

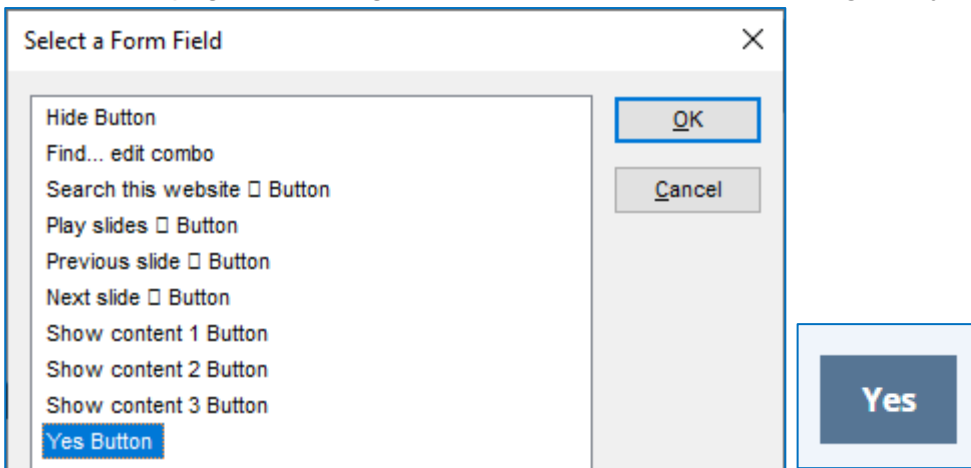
## Description

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

On the homepage and throughout the site (before cookies are accepted or rejected), there is a button ambiguously labelled 'Reject additional'.



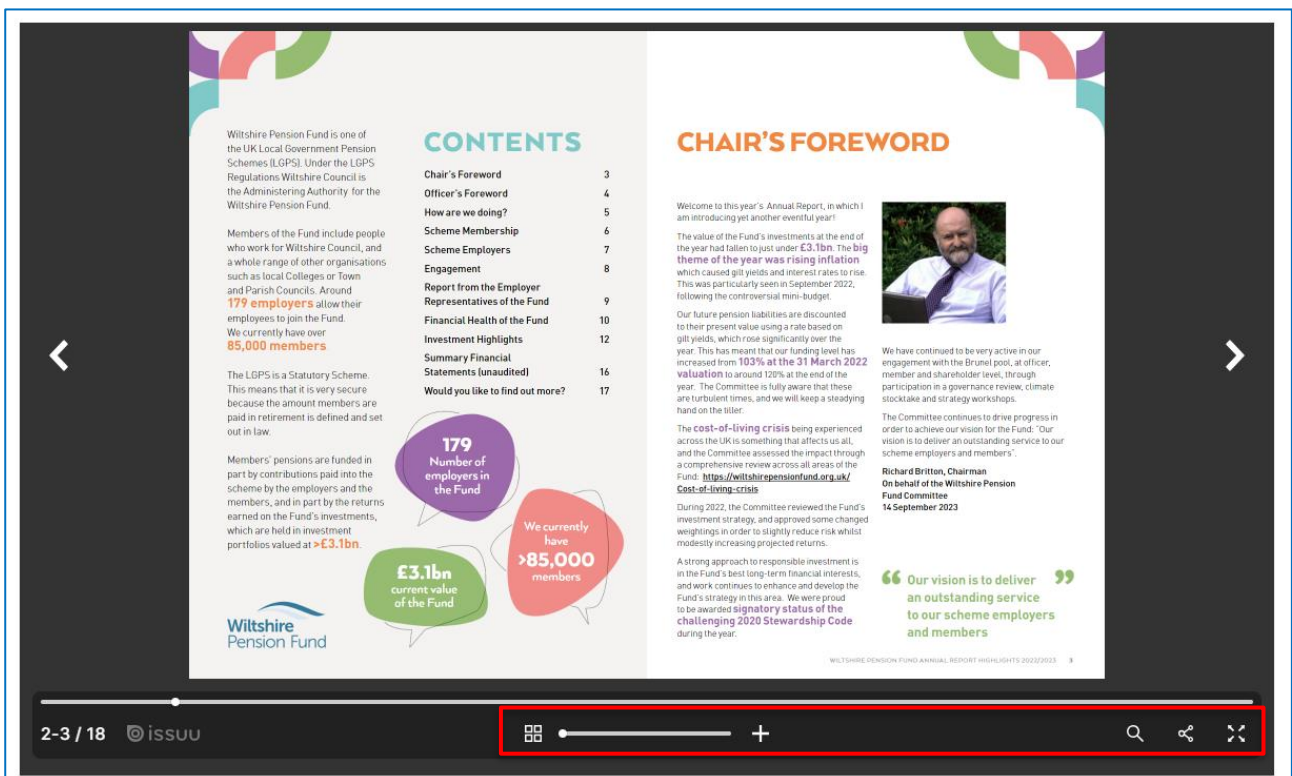
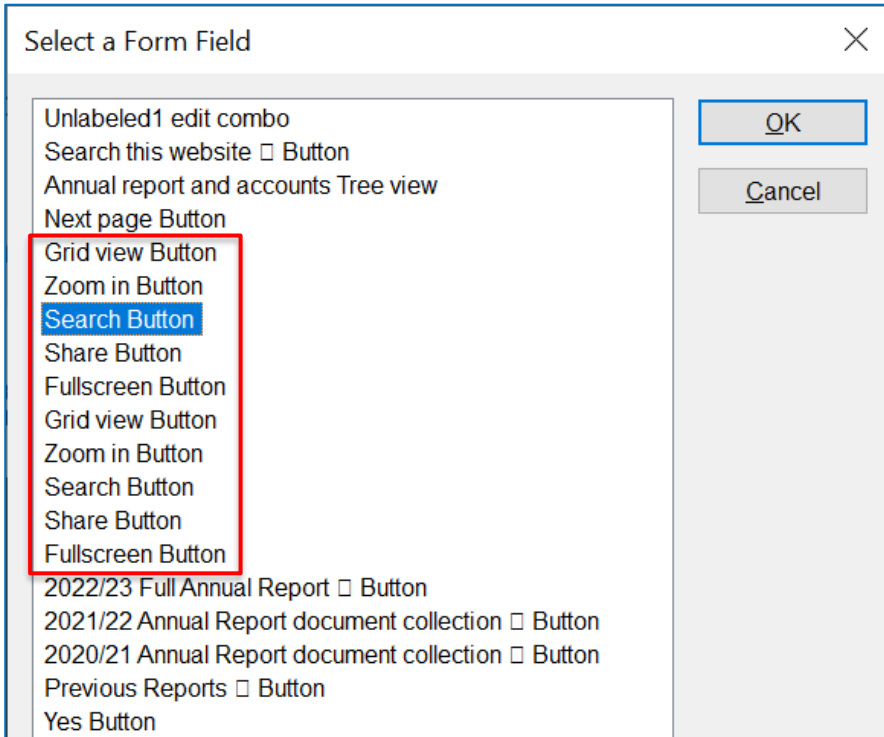
On the homepage and throughout the site, there is a button ambiguously labelled 'Yes'.



The 'Annual-report-and-accounts' page contains the following ambiguously labelled buttons.

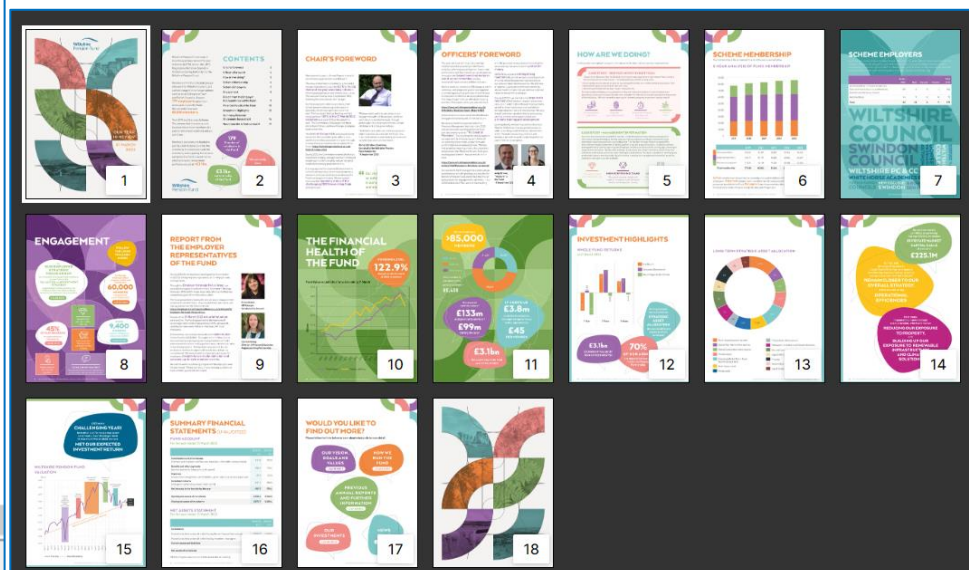
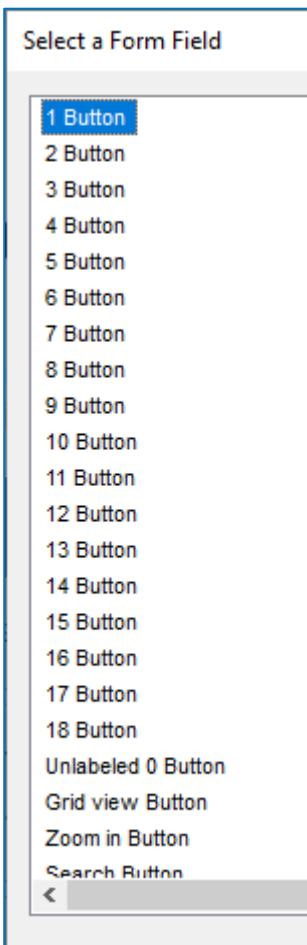
- Grid view Button x 2
- Zoom in Button x 2
- Search Button x 2
- Share Button x 2
- Fullscreen Button x 2

Users are unable to differentiate between these duplicated elements.





Furthermore, when the 'Grid view' button is selected, the user is presented with buttons ambiguously labelled from '1' through to '18'. This issue is present on several pages that contain videos.





# User Comments

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

Alan Sleat  
Screen Reader Assessor

## Occurrences

This issue occurs throughout the site.

## Example Occurrences

<https://www.wiltshirepensionfund.org.uk/>

<https://www.wiltshirepensionfund.org.uk/Annual-report-and-accounts>

<https://www.wiltshirepensionfund.org.uk/Q1-2024-Employers-Newsletter>

<https://member.wiltshirepensionfund.org.uk/article/3627/Member-Webinars-Events>

<https://member.wiltshirepensionfund.org.uk/article/3684/What-if-I-have-an-AVC>

<https://member.wiltshirepensionfund.org.uk/article/5527/Member-Videos-and-Guides>

## Action Required

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

## WCAG References

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

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

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

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

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

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

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

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

# STAS-F08: Non-Descriptive Link Text

## Description

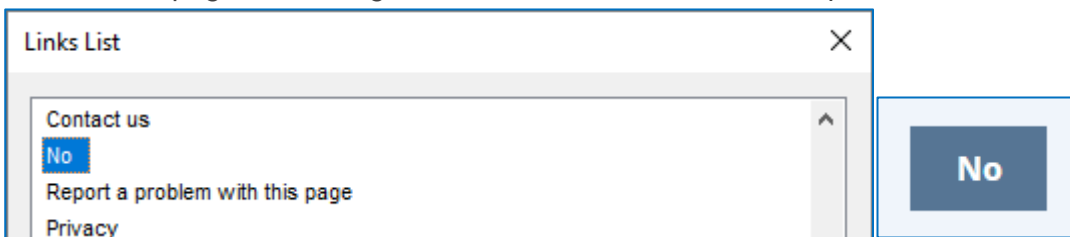
The text of a link should describe the destination of the link and the link's purpose. Providing a descriptive link text will allow users to easily determine the function of the link and make educated decisions to click the link or not.

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

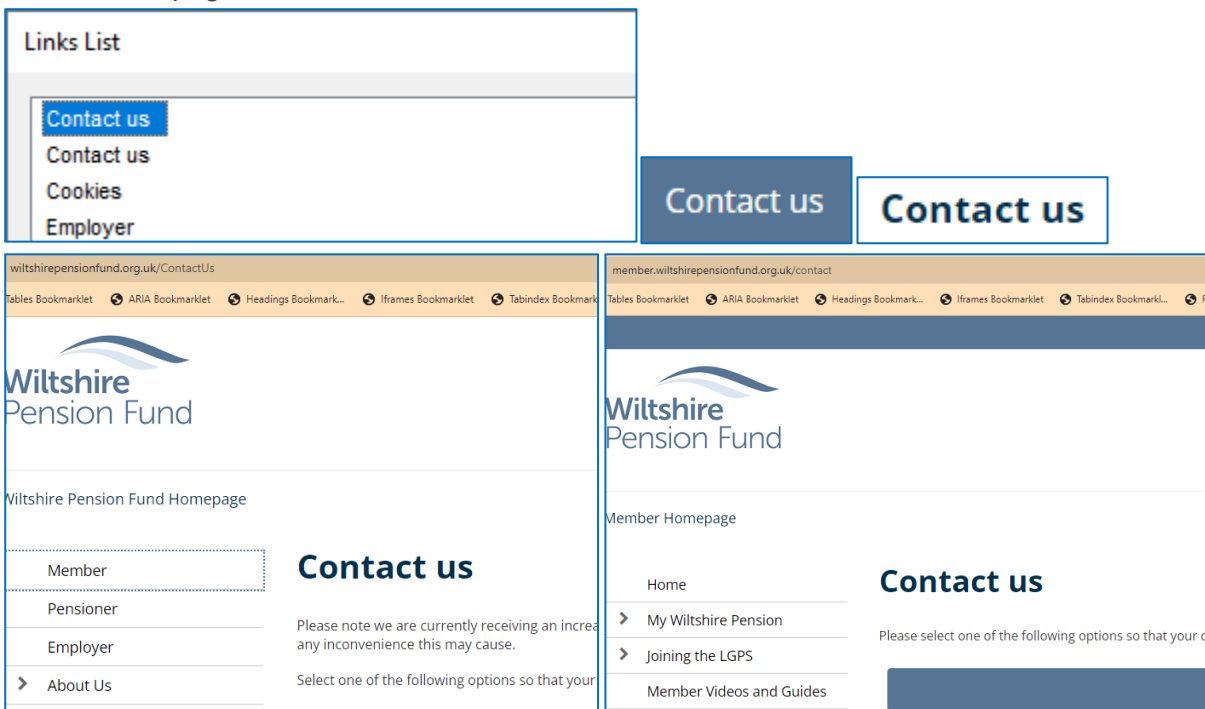
Screen reader users have the ability to display and navigate by lists of elements, or jump from element to element. Navigating this way is much quicker than listening to a whole page, however the context provided by paragraphs and other narrative is lost and non-descriptive links become harder to understand.

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

On the homepage and throughout the site, there is a non-descriptive link labelled 'No'.



On the homepage, there are 2 links labelled 'Contact us' that lead to different destinations.



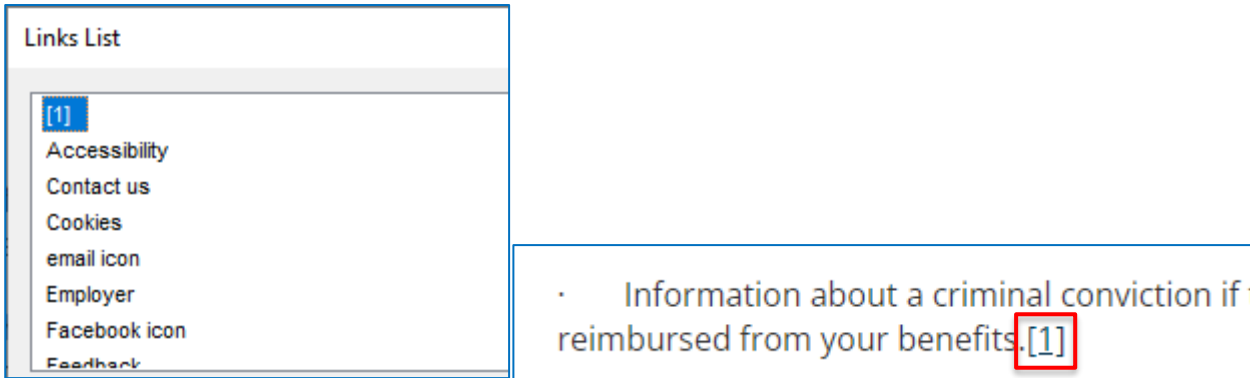
On the 'Day 4- What does this mean for my pocket?' page, there are 2 non-descriptive links labelled 'Wiltshire Pension Fund Awarded "Best approach to responsible investment"' and 2 labelled 'Day 5- Jargon bust your pension'. These links take the user to different locations. The first issue is also present on the 'Pension Awareness Week - 31 October - 6 November 2022' and the 'International Women's Day' pages.

Voting update - Q2 2023	Wiltshire Pension Fund Awarded "Best approach to responsible investment"
Wiltshire Pension Fund Awarded "Best approach to responsible investment"	CIPP Annual Excellence Awards
Day 5- Jargon bust your pension	<a href="#"><u>Day 5- Jargon bust your pension</u></a>

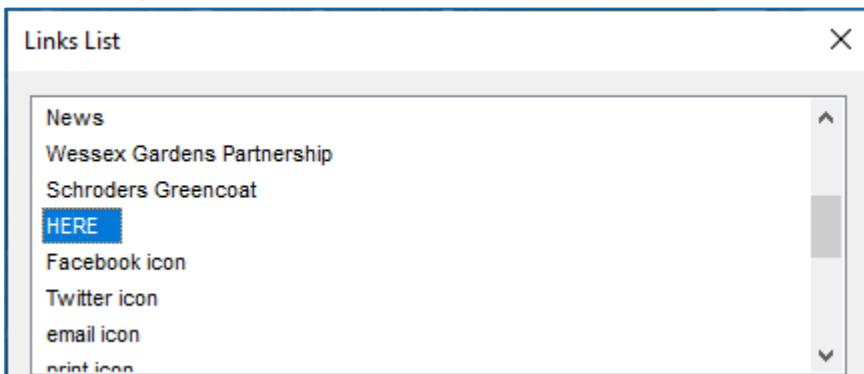
On the 'Our Annual Report 2021/22 is ready to view online' page, there are 2 non-descriptive links labelled 'Wiltshire Pension Fund Awarded "Best approach to responsible investment"' and 2 labelled 'Annual report and accounts'.

Voting update - Q2 2023	Wiltshire Pension Fund Awarded "Best approach to responsible investment"
Wiltshire Pension Fund Awarded "Best approach to responsible investment"	CIPP Annual Excellence Awards
Annual report and accounts	<a href="#"><u>the Annual report and accounts p</u></a>

On the 'Privacy' page, there is a non-descriptive link labelled [1].



On the 'Toucan Energy Portfolio, UK's Largest Operational Solar Portfolio Deal!' page, there is a non-descriptive link labelled 'HERE'.



## User Comments

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

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

Alan Sleat  
Screen Reader Assessor

## Occurrences

This issue occurs throughout the site.

## Example Occurrences

<https://wiltshirepensionfund.org.uk/Homepage>

<https://www.wiltshirepensionfund.org.uk/article/6607/Day-4-What-does-this-mean-for-my-pocket>

<https://www.wiltshirepensionfund.org.uk/Investments-and-your-Pension>

<https://www.wiltshirepensionfund.org.uk/article/6602/Pension-Awareness-Week-31-October-6-November-2022>

<https://www.wiltshirepensionfund.org.uk/InternationalWomensDay>

<https://www.wiltshirepensionfund.org.uk/annual-report-2022>

<https://www.wiltshirepensionfund.org.uk/Privacy>

<https://www.wiltshirepensionfund.org.uk/Toucan-Energy-Portfolio-UKs-Largest-Operational-Solar-Portfolio-Deal>

## Action Required

1. Ensure the purpose of links can be determined from immediate context.
2. Provide additional context to links by altering the link text, adding visually hidden content using CSS, adding an ARIA-label or using ARIA-describedby to link to other content.
3. Ensure links to non-HTML documents include file type and file size within the link text.

Note: Where ARIA is used to provide context, the visual label should appear in the aria label.

## WCAG References

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

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

## Further Information

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

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

<p><b>TOWER OF LONDON</b></p> <p>A 1000-year old fortress, the Tower of London is an iconic landmark in our capital and is the home of the Crown Jewels. Discover the history of this royal palace, prison and fortress and meet the Beefeaters sharing fascinating tales from years ago. Book your tickets <a href="#">here</a>.</p>	<p><b>TOWER OF LONDON</b></p> <p>A 1000-year old fortress, the Tower of London is an iconic landmark in our capital and is the home of the Crown Jewels. Discover the history of this royal palace, prison and fortress and meet the Beefeaters sharing fascinating tales from years ago. <a href="#">Book Tower of London Tickets here</a>.</p>
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Where visual amendments to the link cannot be made, consider one of the following methods of providing additional content to the end of the link.

### Using CSS

Normal Code

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

Adapted Code

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

CSS

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

### Using ARIA

Normal Code

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

Adapted Code

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

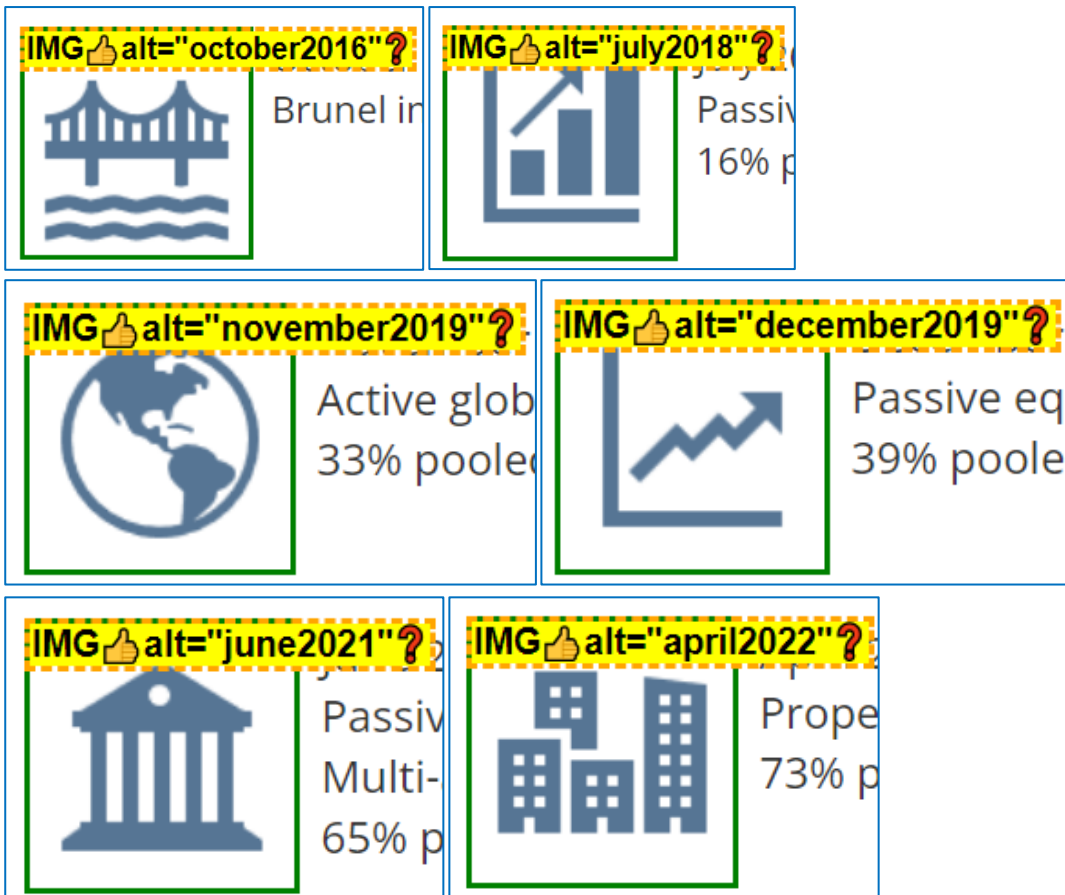
Note: display:none will hide content from screen readers as well as sighted users.

# STAS-F09: Non-Descriptive Alt Text

## Description

Describing the content of images is very important to give users with a visual impairment a similar experience of a website as sighted visitors. Without a valid alternative text, Screen Reading software will use the filename of the image to try and describe the content of the image. Missing out alternative text or using a non-descriptive alternative text can cause confusion for screen reader users.

On the 'Pooling Progress' page are 6 images that contained a non-descriptive alt text.



## User Comments

"The benefit in having alt text to all graphics is to make them inclusive to screen reader users. This will tell them what the page graphic is indicating. The description should describe the graphic shown adequately; however, this description should not be too long; so, short and to-the-point is best. This will improve the feel for screen reader users, and show their experience has been taken into consideration."

Alan Sleat  
Screen Reader Assessor



# Example Occurrences

<https://www.wiltshirepensionfund.org.uk/article/6448/Pooling-Progress-Part-1-overall-progress-and-transitions>

## Action Required

1. Ensure all non-text content has a suitable descriptive alternative text.

Note: The title attribute is not a substitute for alternative text

## WCAG References

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

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

# STAS-F10: Untitled Frames


## Description

There is a frame present on the site that does not contain a descriptive title. When a screen reader user hears a list of frames, the user needs to know the purpose of each one. When frame titles are not present, screen readers look for other sources of information, such as the frame's name attribute or file name. Sometimes these other sources of information are not very helpful at all. If a frame is given a name or filename of "default.htm" (or something equally non-descriptive), there is really no way to know what each frame contains, other than by having the screen reader read through the content.

Alternative content must also be provided for browsers that do not support frames. For example `<iframe src='file.htm'>Alternative content</iframe>`

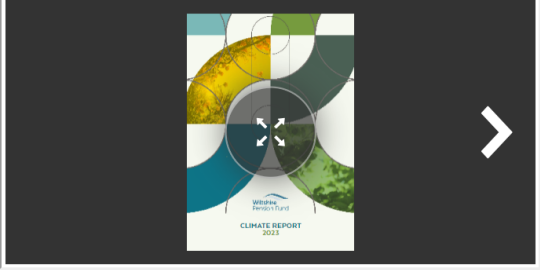
On the 'Climate' page, there are 2 untitled frames.

`<iframe X NO TITLE src="https://e.issuu.com/embed.html?d=wiltshirepensionfund_climate_report_one-pager_v3&hidelssuuLogo=true&hideShareButton=true&showOtherPublicationsAsSuggestions=true&u=wiltshire95">`



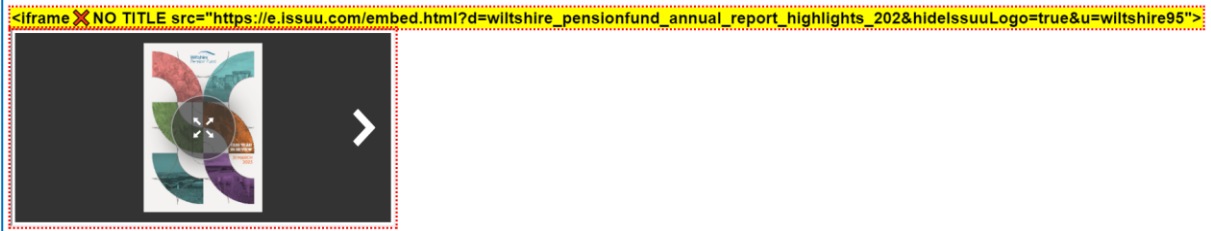
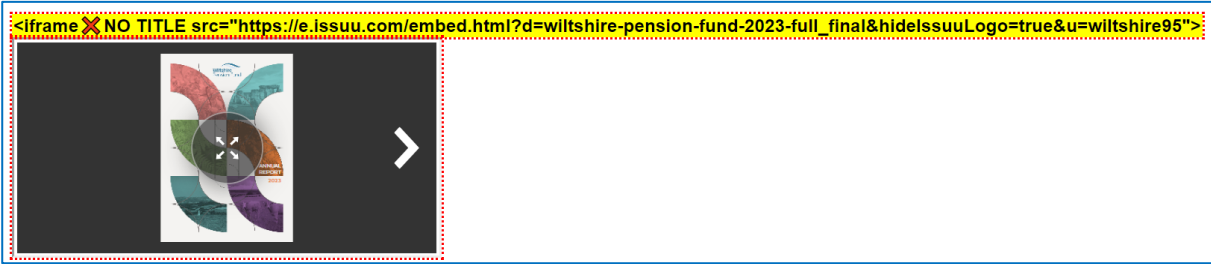
The infographic displays the Wiltshire Pension Fund's climate strategy and action plan. It features a central circular diagram with four quadrants, each representing a different aspect of the strategy. The quadrants are labeled: 'Climate Change', 'Greenhouse Gas Emissions', 'Climate Resilience', and 'Climate Risk'. The infographic also includes various icons and text boxes providing detailed information about the fund's climate goals and actions.

`<iframe X NO TITLE src="https://e.issuu.com/embed.html?d=wiltshire_pensionfund_climate_report_2023&hidelssuuLogo=true&hideShareButton=true&u=wiltshire95">`



The cover page of the Wiltshire Pension Fund Climate Report 2023 features a central graphic of a globe with a circular overlay. The globe is divided into four quadrants, each with a different color and icon. The text 'Wiltshire Pension Fund' and 'CLIMATE REPORT 2023' is visible at the bottom of the page. A large white arrow points to the right, indicating that the report content continues on the next page.

On the 'Our 2022/23 Annual Report has landed! - Our year in review' page, there are 2 untitled frames.



On the 'Climate Summary' page, there are 2 untitled frames.




On the 'Krystie Testing' page, there are 3 untitled frames.

<iframe ❌ NO TITLE src="https://e.issuu.com/embed.html?d=wiltshire\_pensionfund\_annual\_report\_highlights\_202&hideIssuuLogo=true&u=wiltshire95">




The thumbnail shows a document cover for 'Wiltshire Pension Fund' with a central graphic of four overlapping circles in red, green, blue, and purple. Text on the cover includes 'OUR YEAR IN REVIEW' and '31 MARCH 2023'. A white arrow points to the right.

<iframe ❌ NO TITLE src="https://e.issuu.com/embed.html?d=wiltshirepensionfund\_annual-report\_one-pager\_final&hideIssuuLogo=true&u=wiltshire95">



The thumbnail shows a one-pager report with various statistics and charts. Key figures include '17% increase in assets', '£4.871m', '133.3%', and '122.97%'. It features a central graphic similar to the first thumbnail.

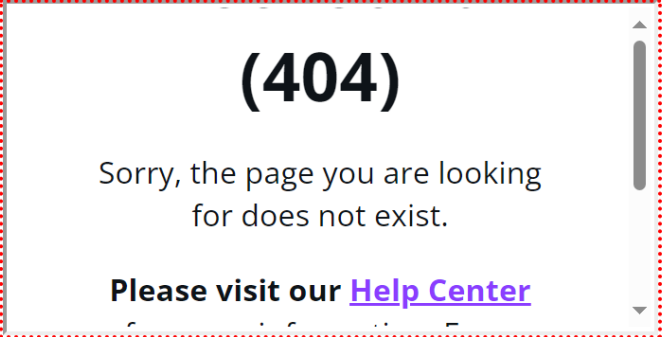
<iframe ❌ NO TITLE src="https://e.issuu.com/embed.html?d=wiltshire-pension-fund-2023-full\_final&hideIssuuLogo=true&u=wiltshire95">



The thumbnail shows a document cover for 'Wiltshire Pension Fund' with a central graphic of four overlapping circles in red, green, blue, and purple. Text on the cover includes 'OUR YEAR IN REVIEW' and '31 MARCH 2023'. A white arrow points to the right.

On the 'Paris Aligned Asset Owners Progress Report' page, there are 2 untitled frames.

<iframe ❌ NO TITLE src="https://www.canva.com/design/DAFR6HEkAGQ/view?embed">



The screenshot shows a 404 error page with the text: '(404) Sorry, the page you are looking for does not exist. Please visit our [Help Center](#)'. A scrollbar is visible on the right side.

<iframe ❌ NO TITLE src="https://www.canva.com/design/DAFR6EqFPyE/view?embed">



The thumbnail shows a report cover titled 'DEEP DIVE: IMPROVING TCFD REPORTING FOR NET ZERO' by Wiltshire Pension Fund. It includes a table of contents and a bar chart. The table lists sections like 'Introduction', 'Key findings', and 'Recommendations'. The bar chart shows progress levels for various categories.

Note: Shaw Trust Accessibility Services realise that the content of frames are usually provided by a third party and are very difficult to alter. However, there should be some form of labelling within the frame to display some content to users or browsers that cannot display the frames' content.

## User Comments

"I found that there was a frame present on the website that did not have a title. Including a frame title would assist screen reader users in understanding what the frame content will be. "

Alan Sleat  
Screen Reader Assessor

## Occurrences

This issue occurs throughout the site.

## Example Occurrences

<https://www.wiltshirepensionfund.org.uk/Climate-pages>

<https://www.wiltshirepensionfund.org.uk/article/8179/Our-2022-23-Annual-Report-has-landed-Our-year-in-review>

<https://www.wiltshirepensionfund.org.uk/Climate-Summary>

<https://www.wiltshirepensionfund.org.uk/article/6823/Krystie-Testing>

<https://www.wiltshirepensionfund.org.uk/Paris-Aligned-Asset-Owners-Progress-Report>

## Action Required

1. Ensure all frames are clearly labelled.
2. Place some alternative content in the <iframe> tag as a fallback should the content not load.

## WCAG References

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

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

# STAS-F11: Incorrect Table coding

## Description

Within web content, there are 2 different uses for tables:

- tables used for layout and formatting
- tables used to display relational data

Each type of table has a different set of coding requirements.


When using tables to convey data, it is important to mark-up the tables correctly to allow screen reader users to interpret the data. Column and row header mark-up <TH> should be added to data tables as they provide the necessary context that enable screen readers to understand the information. Captions should be included to introduce the table content. A summary should be included for complex tables.

When data tables have more than one level of row or column headers, markup should be used to associate the data cells and the header cells. Including unique ID attributes in the 'th' cells and 'Header' attributes in the associated 'td' cells or including 'Scope' attributes in the 'th' cells would resolve this issue.

On the 'Investing in the future of farming' page there are 3 layout tables which should be marked with role="presentation" in the opening table tag. This would instruct the screen reader to ignore the table structure.








On the 'Fast fashion and Responsible Investing' page there are 2 layout tables which should be marked with role="presentation" in the opening table tag. This would instruct the screen reader to ignore the table structure.

<p><b>Responsible ownership and stewardship</b></p> 	<p>Wiltshire Pension Fund has a culture and vision that is supported by a series of 16 Strategic Vision Goals (SVGs). These are outcome focussed and <b>SVG 11, Responsible ownership and stewardship</b>, is particularly relevant in this area. You can read more about this on the <a href="#">'Our vision goals and values'</a> page.</p>
---	---

<p><b>8 DECENT WORK AND ECONOMIC GROWTH</b></p> 	<p>The United Nations Sustainable Development Goals are a call for action to promote prosperity while protecting the planet. They recognize that ending poverty must go hand-in-hand with strategies that build economic growth and address a range of social needs including education, health, social protection, and job opportunities, while tackling climate change and environmental protection.</p> <p>While primarily aimed at governments and policy making, the Goals are increasingly used in the context of institutional investment. Read more on <a href="#">inclusive and sustainable economic growth, employment and decent work for all</a> and why it matters on the United Nations website.</p>
---	--



On the 'Christchurch Solar Farm' page there are 2 layout tables which should be marked with role="presentation" in the opening table tag. This would instruct the screen reader to ignore the table structure.

	
--	---

<div style="display: flex; flex-wrap: wrap;"> <div style="width: 50%; text-align: center;">  <p>18MW</p> </div> <div style="width: 50%; text-align: center;">  <p>Powers 6,500 homes</p> </div> <div style="width: 50%; text-align: center;">  <p>80,000 panels over 87 acres</p> </div> <div style="width: 50%; text-align: center;">  <p>6-7% return</p> </div> </div>	
--	--

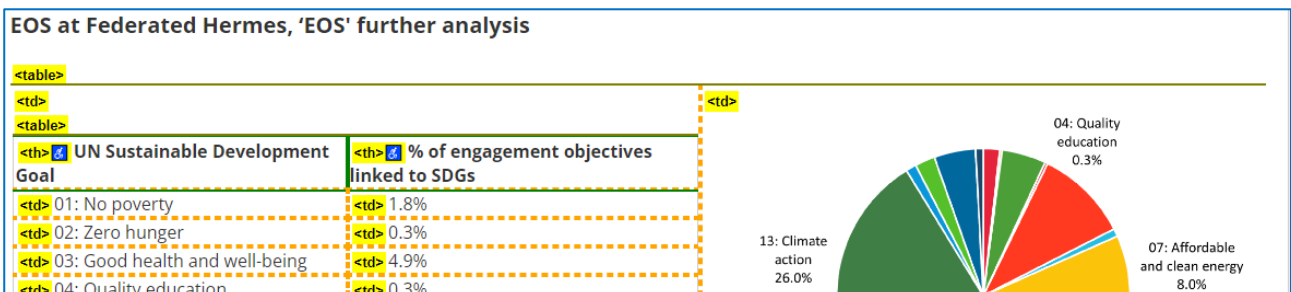
On the 'Pooling Progress - Part 1 (overall progress and transitions)' page there is a data table missing any TH cells making it difficult for screen reader users to understand the content and there is a layout table which should be marked with role="presentation" in the opening table tag. This would instruct the screen reader to ignore the table structure.

Portfolio	Value as at 31 March 22 (£m)	Pooled?	If not pooled, why not?
Brunel passive gilts	462.2	Yes	
Brunel sustainable equities	256.8	Yes	
Brunel Global Link	255.6	Yes	

	October 2016 Brunel incorporated
	July 2018 Passive equities (£415m) 16% pooled

On the 'Investing in education' page, there is a nested table present. The outer table is used for layout and should be marked with role="presentation" in the opening table tag.

UN Sustainable Development Goal	% of engagement objectives linked to SDGs
01: No poverty	1.8%
02: Zero hunger	0.3%
03: Good health and well-	4.9%





On the 'What we invest in and why' page, there is a data table that contains an empty TH cell.

<th> <img alt="broken icon" data-bbox="171 131 188 148"/> Long-term strategic asset allocation	<th> <img alt="broken icon" data-bbox="694 131 711 148"/>
<td> Paris-aligned passive equities	<td> 12.5%
<td> Global High Alpha active equities	<td> 6%
<td> Global Sustainable active equities	<td> 6%
<td> Private equity	<td> 7.5%
<td> Emerging Market Multi-Asset (Active equity & debt)	<td> 10%
<td> Multi-Asset credit	<td> 7.5%
<td> Private debt	<td> 7.5%
<td> Private Core Infrastructure	<td> 4%
<td> Renewable Infrastructure/Climate Solutions	<td> 7%
<td> Secured Income	<td> 8%
<td> Impact Affordable Housing	<td> 5%
<td> Property	<td> 8%
<td> Passive Gilts	<td> 7%
<td> Liquid Loans	<td> 4%

On the 'Privacy' page, there is a data table that contains empty TD cells.

<th> <img alt="broken icon" data-bbox="151 561 168 578"/> Data processors	<th> <img alt="broken icon" data-bbox="570 561 587 578"/> Data controllers
<td> Administrator/Accountants/ Communications - (Wiltshire Council) <td> Additional Voluntary Contribution provider - (currently Utmost Life & Pensions)	<td> National Pooled Fund Company - (Brunel Pension Partnership) <td> Fund Actuary - (Hymans Robertson LLP)
<td> Tracing bureaus for mortality screening and locating members - (Heywood Technologies Ltd)	<td> Actuarial Consultant - (Hyman Robertson LLP)
<td> Overseas payments provider to transmit payments to scheme member with non-UK accounts - (Convera Ltd)	<td> Investment adviser - (Mercer Ltd)
<td> Printing companies - (CFH Printers)	<td> Additional Voluntary Contribution providers - (currently Clerical Medical, Phoenix-NPI & Prudential) <td> Statutory auditor - (currently Deloitte)
<td> Pensions software provider - (Heywood Technologies Ltd & i-Connect Software Ltd)	<td> Stage 1 IDRP Adviser - (currently Muse Advisory Ltd)
<td> Archiving providers - (currently Iron Mountain & DA Solutions Archiving Solutions Ltd)	<td> Internal auditor - (Wiltshire Council)
<td> Legal Advisers - Osborne Clarke LLP and Eversheds Sutherland (International) LLP	<td> LGPS National Insurance database - (South Yorkshire Pensions Authority)
<td> Suppliers of IT, document production and distribution services	<td> The Department for Work and Pensions
<td>	<td> The Government Actuary's Department
<td>	<td> The Cabinet Office - for the purposes of the National Fraud Initiative
<td>	<td> HMRC
<td>	<td> The Courts of England and Wales - for the purpose of processing pension sharing orders on divorce

## User Comments

"I found that there were several data tables on the website that were incorrectly marked up. It is important for screen reader users that the table headings etc. contain the correct markup structure. When data tables are correctly marked up, it makes it easier for a screen reader to understand the table."

Alan Sleat  
Screen Reader Assessor

## Occurrences

This issue occurs throughout the site.

## Example Occurrences

<https://www.wiltshirepensionfund.org.uk/article/7780/Investing-in-the-future-of-farming>

<https://www.wiltshirepensionfund.org.uk/fast-fashion>

<https://www.wiltshirepensionfund.org.uk/article/7080/Christchurch-Solar-Farm>

<https://www.wiltshirepensionfund.org.uk/article/6448/Pooling-Progress-Part-1-overall-progress-and-transitions>

<https://www.wiltshirepensionfund.org.uk/Education>

<https://wiltshirepensionfund.org.uk/what-we-invest-in-and-why>

<https://www.wiltshirepensionfund.org.uk/Privacy>

## Action Required

1. Ensure data tables have column and/or row heading markup.
2. Include a descriptive caption for all data tables.
3. If a table is used for layout, add role="presentation" to the table element.
4. Ensure that all cells contain content. Intentionally blank cells can be marked with a -

## WCAG References

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

# STAS-F12: Video Controls Inaccessible via Screen Reader

## Description

Video content is an excellent way to convey information, however can be a barrier to information for users of assistive technology.

On the 'Our vision, goals and values' page, screen reader users are unable to successfully utilise the video controls. There are occasions where the elements fail to appear in the user's element list and when they do, the user is unable to activate them. Instead, when the user attempts to activates the buttons, their focus jumps to a random place on the page and the element is not activated.



<p>Select a Form Field</p> <ul style="list-style-type: none"><li>Find... edit combo</li><li>Search this website <input type="checkbox"/> Button</li><li>Our vision, goals and values Tree view</li><li>Yes Button</li></ul>	<p>Select a Form Field</p> <ul style="list-style-type: none"><li>Find... edit combo</li><li>Search this website <input type="checkbox"/> Button</li><li>Our vision, goals and values Tree view</li><li>pause Button</li><li>volume Slider 0</li><li>un-mute Button</li><li>enter full screen Button</li><li>show more media controls more options Button</li><li>video time scrubber total time: 0:58 Slider elapsed time: 0:00</li><li>Yes Button</li></ul>
---	--

# User Comments

“When viewing the new ‘Business and Accounting with International Study BA’ page, I found that some buttons are not clearly labelled, prior to the content playing; and no buttons are labelled during the content playing. Including a clear description for all the buttons will resolve the problem, and will maintain a positive user experience as a result.”

Alan Sleat  
Screen Reader Assessor

## Example Occurrences

<https://wiltshirepensionfund.org.uk/Our-vision-goals-and-values>

## Action Required

1. Ensure all controls are labelled correctly.
2. Ensure all controls are accessible via mouse and keyboard.

## WCAG References

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

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

**1.4.2 Audio Control:** If any audio on a Web page plays automatically for more than 3 seconds, either a mechanism is available to pause or stop the audio, or a mechanism is available to control audio volume independently from the overall system volume level. (Level A)

*Note:* Since any content that does not meet this success criterion can interfere with a user's ability to use the whole page, all content on the Web page (whether or not it is used to meet other success criteria) must meet this success criterion. See Conformance Requirement 5: Non-Interference.

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

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

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

**2.2.2 Pause, Stop, Hide:** For moving, blinking, scrolling, or auto-updating information, all of the following are true: (Level A)

- **Moving, blinking, scrolling:** For any moving, blinking or scrolling information that (1) starts automatically, (2) lasts more than five seconds, and (3) is presented in parallel with other content, there is a mechanism for the user to pause, stop, or hide it unless the movement, blinking, or scrolling is part of an activity where it is essential; and
- **Auto-updating:** For any auto-updating information that (1) starts automatically and (2) is presented in parallel with other content, there is a mechanism for the user to pause, stop, or hide it or to control the frequency of the update unless the auto-updating is part of an activity where it is essential.

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

# STAS-F13: Video missing Audio Description

## Description

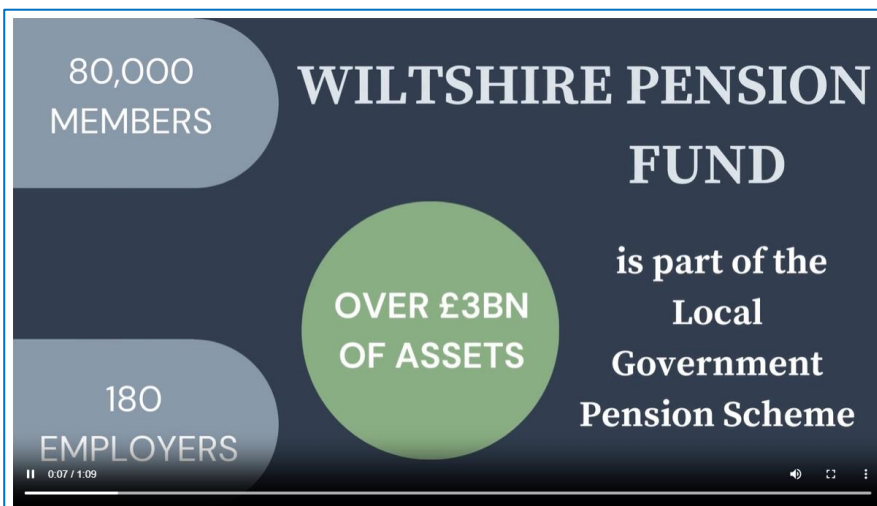
The website contained embedded videos on a number of pages. To enable users who have limited or no sight understand content in videos that have no sound, they should have an audio description to explain any quiet parts.

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

The 'Our vision, goals and values' page contains a video that displayed information visually that is unavailable to blind or low vision users.



The 'Working at Wiltshire Pension Fund' page contains a video that displayed information visually that is unavailable to blind or low vision users.



The 'Purposeful Pensions - its landed!' page contains a video that displayed information visually that is unavailable to blind or low vision users.



The 'Investing in our own backyard' page contains a video that displayed information visually that is unavailable to blind or low vision users.



The 'Christmas Opening Hours' page contains a video that displayed information visually that is unavailable to blind or low vision users.



## User Comments

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

Alan Sleat  
Screen Reader Assessor

## Occurrences

This issue occurs throughout the site.

## Example Occurrences

<https://wiltshirepensionfund.org.uk/Our-vision-goals-and-values>

<https://wiltshirepensionfund.org.uk/article/6719/Working-at-Wiltshire-Pension-Fund>

<https://www.wiltshirepensionfund.org.uk/article/7148/Purposeful-Pensions-its-landed>

<https://www.wiltshirepensionfund.org.uk/article/7060/Investing-in-our-own-backyard>

<https://www.wiltshirepensionfund.org.uk/2023-Christmas-Opening-Hours>



## Action Required

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

## WCAG References

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

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

# STAS-F14: Video and Audio missing Text Alternatives

## Description

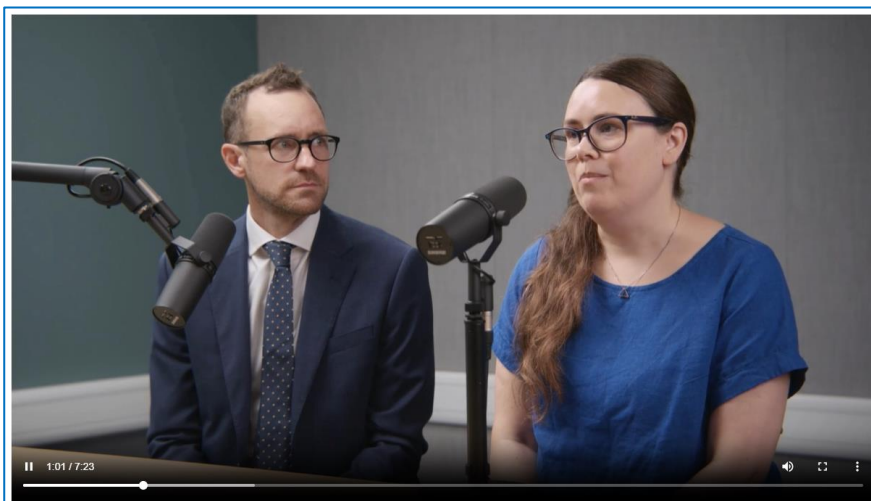
The website contained embedded videos on a number of pages. To enable users who have hearing impairments understand content in videos, they must have a text alternative. Transcripts and subtitles can be used to convey the information within the video to hearing impaired users.

Several videos used throughout the website site failed to provide a text alternative in the form of a transcript. The videos do provide text based captions, but several of these have been automatically generated by the video platform and should not be relied upon for accuracy. There are also videos that provide no transcript and no captions.

The 'How the Spring Budget is changing the LGPS' page contains a video with no transcript and relies on automatically generated captions that may not be accurate.



The 'WPF and Ninety One: Transition in Emerging Markets' page contains a video with no transcript and no captions.



# User Comments

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

Darren Hardman  
Hard of Hearing and Deaf Assessor

## Example Occurrences

<https://www.wiltshirepensionfund.org.uk/article/7331/How-the-Spring-Budget-is-changing-the-LGPS>  
<https://www.wiltshirepensionfund.org.uk/WPF-Ninety-One-Transition-in-emerging-markets>

## Action Required

1. Ensure that all audio and video content has a text alternative (transcript and captions)
2. Ensure to check and amend any auto generated captions to ensure accuracy

## WCAG References

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

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

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

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

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

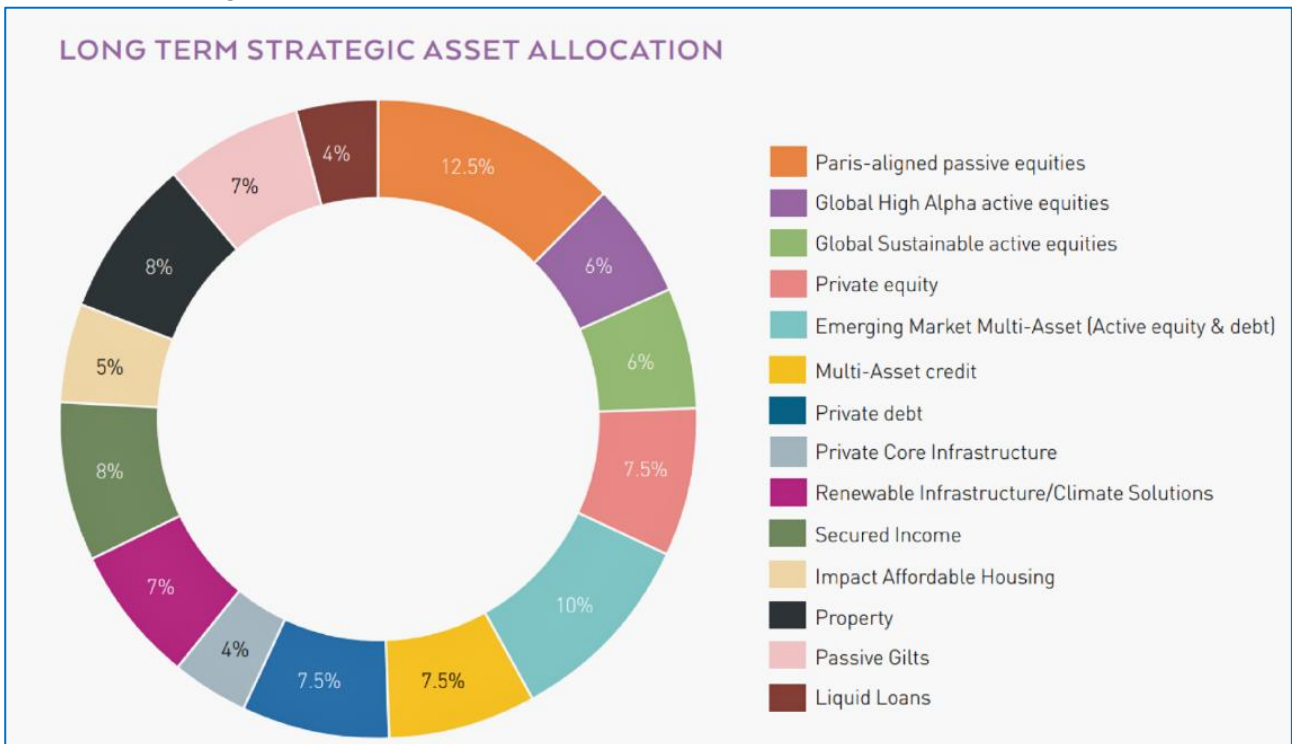
**1.2.3 Audio Description or Media Alternative (Prerecorded):** An alternative for time-based media or audio description of the prerecorded video content is provided for synchronized media, except when the media is a media alternative for text and is clearly labeled as such. (Level A)

# STAS-F15: Conveying Information using colour alone

## Description

Colour is a great way to emphasis information or to convey a change, however colour should not be the only way that a user is informed of a change on a web page. People with low vision, colour blind, elderly and people with situational disabilities depend on more than one way to find information on the page.

On the 'What we invest in and why' page, there is a chart and legend that relies on conveying information through colour alone.



## Example Occurrences

<https://wiltshirepensionfund.org.uk/what-we-invest-in-and-why>

# Action Required

1. Ensure that colour is not the only means of indicating that an action has occurred.
2. Do not use colour as sole method to convey information.
3. Ensure instructions/prompts provided in text don't refer to colour alone.
4. Ensure instructions are provided in text for graphs and charts where colour is used to convey information.
5. Ensure more than one visual clue that include common icons and colours to differentiate texts and user interface elements.

# WCAG References

**1.4.1 Use of Color:** Color is not used as the only visual means of conveying information, indicating an action, prompting a response, or distinguishing a visual element. (Level A)

*Note:* This success criterion addresses color perception specifically. Other forms of perception are covered in Guideline 1.3 including programmatic access to color and other visual presentation coding.

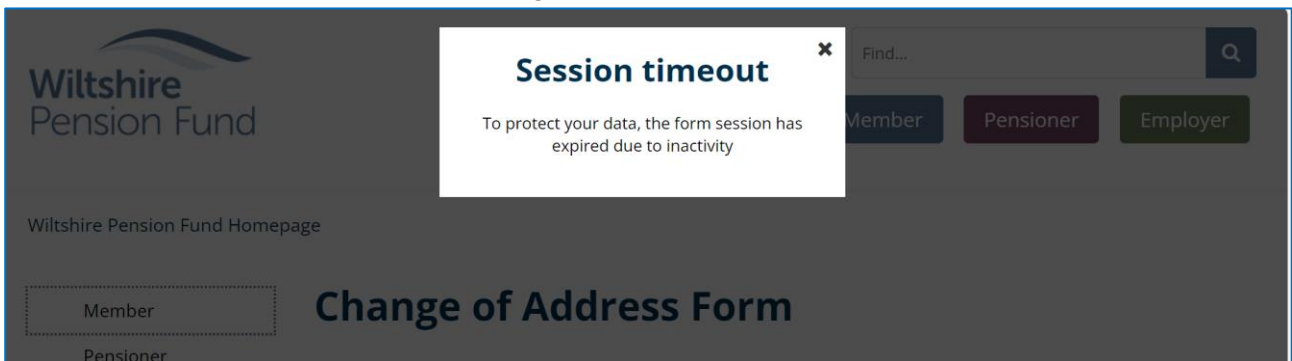
**1.3.3 Sensory Characteristics:** Instructions provided for understanding and operating content do not rely solely on sensory characteristics of components such as shape, size, visual location, orientation, or sound. (Level A)

# STAS-F16: Users unaware of Time Limit

## Description

People with disabilities such as blindness, low vision, poor dexterity and cognitive impairments may require more time to read content or to perform functions such as filling out forms. When a website imposes a short time limit for completing tasks online, it may be difficult for some users to perform the required action before time runs out.

During testing, it was observed that there is a time limit to the 'Change of Address Form' and that the length of time was insufficient for certain users. In addition, there is no warning that a time limit exists or the duration beforehand. The only indication that there is a time limit is when a warning message appears when it expires. The problem is compounded as there is no option to extend the time limit and the user is forced to start again.



## Example Occurrences

<https://wiltshirepensionfund.org.uk/article/7539/Change-of-Address-Form>

## Action Required

1. Inform users that there is a time limit present, and what the duration of the time limit is.
2. Allow the user to extend the time limit before they begin
3. Inform users when they are near the time limit
4. Give the user at least 20 seconds to extend the time limit with a simple action

# WCAG References

**2.2.1 Timing Adjustable:** For each time limit that is set by the content, at least one of the following is true: (Level A)

- **Turn off:** The user is allowed to turn off the time limit before encountering it; or
- **Adjust:** The user is allowed to adjust the time limit before encountering it over a wide range that is at least ten times the length of the default setting; or
- **Extend:** The user is warned before time expires and given at least 20 seconds to extend the time limit with a simple action (for example, "press the space bar"), and the user is allowed to extend the time limit at least ten times; or
- **Real-time Exception:** The time limit is a required part of a real-time event (for example, an auction), and no alternative to the time limit is possible; or
- **Essential Exception:** The time limit is essential and extending it would invalidate the activity; or
- **20 Hour Exception:** The time limit is longer than 20 hours.

*Note:* This success criterion helps ensure that users can complete tasks without unexpected changes in content or context that are a result of a time limit. This success criterion should be considered in conjunction with Success Criterion 3.2.1, which puts limits on changes of content or context as a result of user action.

# STAS-F17: Inaccessible Non-HTML Documents

## Description

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

Type	Issue	Quantity
PDF	Figures and images in PDF documents should have non blank ALT text, except for decorative images which should be marked as artifacts.	69
PDF	Document title must not be blank.	65
PDF	PDFs must be tagged to be accessible by screen readers.	55
PDF	Use the lang attribute to identify the language of the page.	17
PDF	alt text should not be an image file name.	2
Word	Word document contains a graphic without Alt Text.	2

A scan of the 'Wiltshire-Pension-Fund-2022\_v6.pdf' document produced the following results:

29 checks performed / 11 checks passed (37%) / 18 checks failed

<p><b>Document (3 issues)</b></p> <ul style="list-style-type: none"> <li>✓ Accessibility permission flag</li> <li>✓ Image-only PDF</li> <li>✗ Tagged PDF</li> <li>✓ Primary language</li> <li>✗ Title</li> <li>✗ Bookmarks</li> </ul>	<p><b>Alternate Text (5 issues)</b></p> <ul style="list-style-type: none"> <li>✗ Figures alternate text</li> <li>✗ Nested alternate text</li> <li>✗ Associated with content</li> <li>✗ Hides annotation</li> <li>✗ Other elements alternate text</li> </ul>
<p><b>Page Content (4 issues)</b></p> <ul style="list-style-type: none"> <li>✗ Tagged content</li> <li>✗ Tagged annotations</li> <li>✗ Tab order</li> <li>✓ Character encoding</li> <li>✓ Tagged multimedia</li> <li>✓ Screen flicker</li> <li>✓ Scripts</li> <li>✓ Timed responses</li> <li>✓ Navigation links</li> <li>✗ Appropriate heading nesting</li> </ul>	<p><b>Forms (0 issues)</b></p> <ul style="list-style-type: none"> <li>✓ Tagged form fields</li> <li>✓ Field descriptions</li> </ul> <p><b>Tables (4 issues)</b></p> <ul style="list-style-type: none"> <li>✗ Rows</li> <li>✗ TH and TD</li> <li>✗ Headers</li> <li>✗ Regularity</li> </ul> <p><b>Lists (2 issues)</b></p> <ul style="list-style-type: none"> <li>✗ List items</li> <li>✗ Lbl and LBody</li> </ul>



A scan of the 'Wiltshire\_PensionFund\_Mini\_RI\_Stewardship\_Highlights\_Report\_v6.pdf' document produced the following results:

29 checks performed / 12 checks passed (41%) / 17 checks failed

<b>Document (2 issues)</b>	<b>Alternate Text (5 issues)</b>
<ul style="list-style-type: none"><li>✓ Accessibility permission flag</li><li>✓ Image-only PDF</li><li>✗ Tagged PDF</li><li>✓ Primary language</li><li>✗ Title</li><li>✓ Bookmarks</li></ul>	<ul style="list-style-type: none"><li>✗ Figures alternate text</li><li>✗ Nested alternate text</li><li>✗ Associated with content</li><li>✗ Hides annotation</li><li>✗ Other elements alternate text</li></ul>
<b>Page Content (4 issues)</b>	<b>Forms (0 issues)</b>
<ul style="list-style-type: none"><li>✗ Tagged content</li><li>✗ Tagged annotations</li><li>✗ Tab order</li><li>✓ Character encoding</li><li>✓ Tagged multimedia</li><li>✓ Screen flicker</li><li>✓ Scripts</li><li>✓ Timed responses</li><li>✓ Navigation links</li><li>✗ Appropriate heading nesting</li></ul>	<ul style="list-style-type: none"><li>✓ Tagged form fields</li><li>✓ Field descriptions</li></ul>
	<b>Tables (4 issues)</b>
	<ul style="list-style-type: none"><li>✗ Rows</li><li>✗ TH and TD</li><li>✗ Headers</li><li>✗ Regularity</li></ul>
	<b>Lists (2 issues)</b>
	<ul style="list-style-type: none"><li>✗ List items</li><li>✗ Lbl and LBody</li></ul>

A scan of the 'LPB\_Annual\_Report\_2022\_-\_Final\_17k0e9lrr4hwc.pdf' document produced the following results:

29 checks performed / 27 checks passed (93%) / 2 checks failed

<b>Document (1 issues)</b>	<b>Alternate Text (1 issues)</b>
<ul style="list-style-type: none"><li>✓ Accessibility permission flag</li><li>✓ Image-only PDF</li><li>✓ Tagged PDF</li><li>✓ Primary language</li><li>✗ Title</li><li>✓ Bookmarks</li></ul>	<ul style="list-style-type: none"><li>✗ Figures alternate text</li><li>✓ Nested alternate text</li><li>✓ Associated with content</li><li>✓ Hides annotation</li><li>✓ Other elements alternate text</li></ul>
<b>Page Content (0 issues)</b>	<b>Forms (0 issues)</b>
<ul style="list-style-type: none"><li>✓ Tagged content</li><li>✓ Tagged annotations</li><li>✓ Tab order</li><li>✓ Character encoding</li><li>✓ Tagged multimedia</li><li>✓ Screen flicker</li><li>✓ Scripts</li><li>✓ Timed responses</li><li>✓ Navigation links</li><li>✓ Appropriate heading nesting</li></ul>	<ul style="list-style-type: none"><li>✓ Tagged form fields</li><li>✓ Field descriptions</li></ul>
	<b>Tables (0 issues)</b>
	<ul style="list-style-type: none"><li>✓ Rows</li><li>✓ TH and TD</li><li>✓ Headers</li><li>✓ Regularity</li></ul>
	<b>Lists (0 issues)</b>
	<ul style="list-style-type: none"><li>✓ List items</li><li>✓ Lbl and LBody</li></ul>

A scan of the 'Local\_Pension\_Board\_Annual\_Report\_2021\_(1).pdf' document produced the following results:

29 checks performed / 26 checks passed (89%) / 3 checks failed

<b>Document (2 issues)</b>	<b>Alternate Text (1 issues)</b>
<ul style="list-style-type: none"><li>✓ Accessibility permission flag</li><li>✓ Image-only PDF</li><li>✓ Tagged PDF</li><li>✓ Primary language</li><li>✗ Title</li><li>✗ Bookmarks</li></ul>	<ul style="list-style-type: none"><li>✗ Figures alternate text</li><li>✓ Nested alternate text</li><li>✓ Associated with content</li><li>✓ Hides annotation</li><li>✓ Other elements alternate text</li></ul>
<b>Page Content (0 issues)</b>	<b>Forms (0 issues)</b>
<ul style="list-style-type: none"><li>✓ Tagged content</li><li>✓ Tagged annotations</li><li>✓ Tab order</li><li>✓ Character encoding</li><li>✓ Tagged multimedia</li><li>✓ Screen flicker</li><li>✓ Scripts</li><li>✓ Timed responses</li><li>✓ Navigation links</li><li>✓ Appropriate heading nesting</li></ul>	<ul style="list-style-type: none"><li>✓ Tagged form fields</li><li>✓ Field descriptions</li></ul>
	<b>Tables (0 issues)</b>
	<ul style="list-style-type: none"><li>✓ Rows</li><li>✓ TH and TD</li><li>✓ Headers</li><li>✓ Regularity</li></ul>
	<b>Lists (0 issues)</b>
	<ul style="list-style-type: none"><li>✓ List items</li><li>✓ Lbl and LBody</li></ul>

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

## User Comments

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

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

Alan Sleat  
Screen Reader Assessor

## Occurrences

This issue occurs throughout the site.

# Example Occurrences

PDF - PDFs must be tagged to be accessible by screen readers. 55 files, including:

[https://www.wiltshirepensionfund.org.uk/media/9617/WPF-Annual-Report-2021-22/pdf/Wiltshire-Pension-Fund-2022\\_v6.pdf?m=1659008915423](https://www.wiltshirepensionfund.org.uk/media/9617/WPF-Annual-Report-2021-22/pdf/Wiltshire-Pension-Fund-2022_v6.pdf?m=1659008915423)  
<https://www.wiltshirepensionfund.org.uk/media/9781/PAW-22-What-does-this-mean-for-my-pocket/pdf/Day 4- What does this mean for my pocket.pdf?m=1662466548010>  
<https://www.wiltshirepensionfund.org.uk/media/9615/AR-One-Page-Summary-2021-22/pdf/WiltshirePensionFund Annual-Report-2022 One-Pager v3.pdf?m=1658916331790>  
<https://www.wiltshirepensionfund.org.uk/media/9629/WPF-Annual-Report-Highlights-Magazine-2021-2022/pdf/Wiltshire PensionFund Annual-Report-2022 Highlights v5.pdf?m=1659094102023>  
<https://www.wiltshirepensionfund.org.uk/media/12292/2023-Youth-Engagement-Project-the-results/pdf/2023 Youth Engagement Survey Results.pdf?m=1699947996977>

PDF - Figures and images in PDF documents should have non blank ALT text, except for decorative images which should be marked as artifacts. 69 files, including:

<https://www.wiltshirepensionfund.org.uk/media/9043/Stewardship-Highlights-Report-2022/pdf/Wiltshire PensionFund Mini RI Stewardship Highlights Report v6.pdf?m=637850228424300000>  
<https://www.wiltshirepensionfund.org.uk/media/6046/Wiltshire-Pension-Fund-Annual-Report-2016-17/pdf/wiltshire-pension-fund-annual-report-2017.pdf?m=1614804163763>  
<https://www.wiltshirepensionfund.org.uk/media/6045/Wiltshire-Pension-Fund-Annual-Report-2015-16/pdf/annual-report-15-16-final.pdf?m=1614804163567>  
<https://www.wiltshirepensionfund.org.uk/media/11169/Affordable-Housing-Impact-Report-2023/pdf/Wiltshire PensionFund Affordable Housing Report 2023 v5.pdf?m=1682347608893>  
<https://www.wiltshirepensionfund.org.uk/media/11214/Stewardship-Report-2023/pdf/Wiltshire Pension Fund Stewardship Report 2023 v8.pdf?m=1683632718540>

PDF - Document title must not be blank. 65 files, including:

<https://www.wiltshirepensionfund.org.uk/media/6142/Communications-strategy/pdf/Communications Strategy 2021.pdf?m=1689687549810>  
<https://www.wiltshirepensionfund.org.uk/media/9659/Local-Pension-Board-Annual-Report-2022/pdf/LPB Annual Report 2022 - Final 17k0e9lrr4hwc.pdf?m=1659600917757>  
<https://www.wiltshirepensionfund.org.uk/media/6056/Local-Pension-Board-Terms-of-Reference-2020/pdf/terms-of-reference-lpb-2020.pdf?m=637504039762730000>  
<https://www.wiltshirepensionfund.org.uk/media/6142/Communications-strategy/pdf/Communications strategy.pdf?m=637506307791730000>  
[https://www.wiltshirepensionfund.org.uk/media/7755/Local-Pension-Board-Annual-Report-2021/pdf/Local Pension Board Annual Report 2021\\_1.pdf?m=1640163208530](https://www.wiltshirepensionfund.org.uk/media/7755/Local-Pension-Board-Annual-Report-2021/pdf/Local Pension Board Annual Report 2021_1.pdf?m=1640163208530)

PDF - Use the lang attribute to identify the language of the page. 17 files, including:

[https://www.wiltshirepensionfund.org.uk/media/9778/PAW-22-MOT-your-Pension/pdf/Day\\_1- MOT your Pension.pdf?m=1662466547853](https://www.wiltshirepensionfund.org.uk/media/9778/PAW-22-MOT-your-Pension/pdf/Day_1- MOT your Pension.pdf?m=1662466547853)

[https://www.wiltshirepensionfund.org.uk/media/7101/Wiltshire-Pension-Fund-Email5-WPF-Day-Five/pdf/Wiltshire-Pension-Fund-Email5\\_WPF\\_Day\\_Five.pdf?m=1631112928037](https://www.wiltshirepensionfund.org.uk/media/7101/Wiltshire-Pension-Fund-Email5-WPF-Day-Five/pdf/Wiltshire-Pension-Fund-Email5_WPF_Day_Five.pdf?m=1631112928037)

[https://www.wiltshirepensionfund.org.uk/media/7102/Wiltshire-Pension-Fund-Email4-WPF-Day-Four/pdf/Wiltshire-Pension-Fund-Email4\\_WPF\\_Day\\_Four.pdf?m=1631112928237](https://www.wiltshirepensionfund.org.uk/media/7102/Wiltshire-Pension-Fund-Email4-WPF-Day-Four/pdf/Wiltshire-Pension-Fund-Email4_WPF_Day_Four.pdf?m=1631112928237)

[https://www.wiltshirepensionfund.org.uk/media/7103/Wiltshire-Pension-Fund-Email3-WPF-Day-Three/pdf/Wiltshire-Pension-Fund-Email3\\_WPF\\_Day\\_Three.pdf?m=1631112928557](https://www.wiltshirepensionfund.org.uk/media/7103/Wiltshire-Pension-Fund-Email3-WPF-Day-Three/pdf/Wiltshire-Pension-Fund-Email3_WPF_Day_Three.pdf?m=1631112928557)

[https://www.wiltshirepensionfund.org.uk/media/11809/PAW23-Day2/pdf/PAW23\\_Day2.pdf?m=1694073328457](https://www.wiltshirepensionfund.org.uk/media/11809/PAW23-Day2/pdf/PAW23_Day2.pdf?m=1694073328457)

PDF - alt text should not be an image file name. 2 files:

[https://www.wiltshirepensionfund.org.uk/media/7755/Local-Pension-Board-Annual-Report-2021/pdf/Local\\_Pension\\_Board\\_Annual\\_Report\\_2021\\_1.pdf?m=1640163208530](https://www.wiltshirepensionfund.org.uk/media/7755/Local-Pension-Board-Annual-Report-2021/pdf/Local_Pension_Board_Annual_Report_2021_1.pdf?m=1640163208530)

<https://www.wiltshirepensionfund.org.uk/media/6047/Wiltshire-Pension-Fund-Annual-Report-2017-18/pdf/annual-report-2017-18.pdf?m=1614804163873>

Word - Word document contains a graphic without Alt Text. 2 files:

[https://www.wiltshirepensionfund.org.uk/media/8920/Nomination-Form/doc/Nomination\\_for\\_Scheme\\_Member\\_of\\_a\\_Local\\_Pension\\_Board\\_Form\\_-\\_2022.docx?m=1647000667547](https://www.wiltshirepensionfund.org.uk/media/8920/Nomination-Form/doc/Nomination_for_Scheme_Member_of_a_Local_Pension_Board_Form_-_2022.docx?m=1647000667547)

[https://www.wiltshirepensionfund.org.uk/media/9189/Nomination-Form-for-Employer-Rep/doc/Nomination\\_for\\_Employer\\_Rep\\_of\\_a\\_Local\\_Pension\\_Board\\_Form\\_-\\_2022.docx?m=1652437297033](https://www.wiltshirepensionfund.org.uk/media/9189/Nomination-Form-for-Employer-Rep/doc/Nomination_for_Employer_Rep_of_a_Local_Pension_Board_Form_-_2022.docx?m=1652437297033)

## Action Required

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

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

## WCAG References

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

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

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

**3.1.1 Language of Page:** The default human language of each Web page can be programmatically determined. (Level A)

# STAS-F18: HTML Markup Errors

## Description

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

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

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

Page checked	Errors	Warnings
<a href="https://www.wiltshirepensionfund.org.uk/article/3126/Search">https://www.wiltshirepensionfund.org.uk/article/3126/Search</a>	9	18
<a href="https://www.wiltshirepensionfund.org.uk/Climate-Summary">https://www.wiltshirepensionfund.org.uk/Climate-Summary</a>	17	18
<a href="https://www.wiltshirepensionfund.org.uk/article/6662/Fund-update-on-current-market-conditions">https://www.wiltshirepensionfund.org.uk/article/6662/Fund-update-on-current-market-conditions</a>	16	20
<a href="https://www.wiltshirepensionfund.org.uk/COP27-Press-release">https://www.wiltshirepensionfund.org.uk/COP27-Press-release</a>	14	20
<a href="https://www.wiltshirepensionfund.org.uk/article/7771/Upcoming-Member-Webinars">https://www.wiltshirepensionfund.org.uk/article/7771/Upcoming-Member-Webinars</a>	16	21

## Occurrences

This issue occurs throughout the site.

## Example Occurrences

<https://www.wiltshirepensionfund.org.uk/article/3126/Search>

<https://www.wiltshirepensionfund.org.uk/Climate-Summary>

<https://www.wiltshirepensionfund.org.uk/article/6662/Fund-update-on-current-market-conditions>

<https://www.wiltshirepensionfund.org.uk/COP27-Press-release>

<https://www.wiltshirepensionfund.org.uk/article/7771/Upcoming-Member-Webinars>

# Action Required

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

## WCAG References

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

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

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

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

# Priority AA Issues



# STAS-F19: Insufficient Colour Contrast

## Description

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

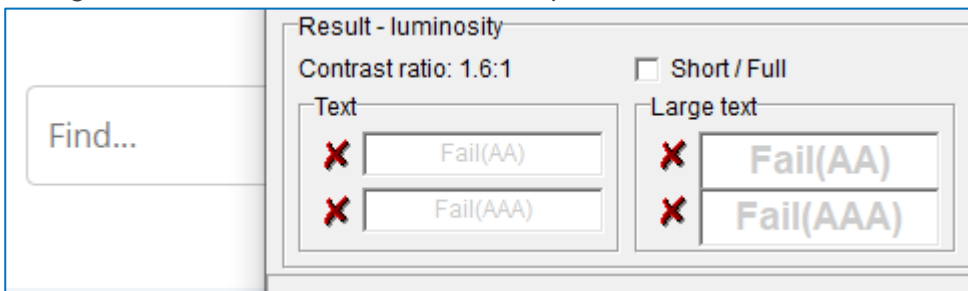
The minimum colour contrast ratio between the foreground and background should be at least 4.5:1. For large text, the ratio can be lowered to 3:1.

Text is considered large if it is

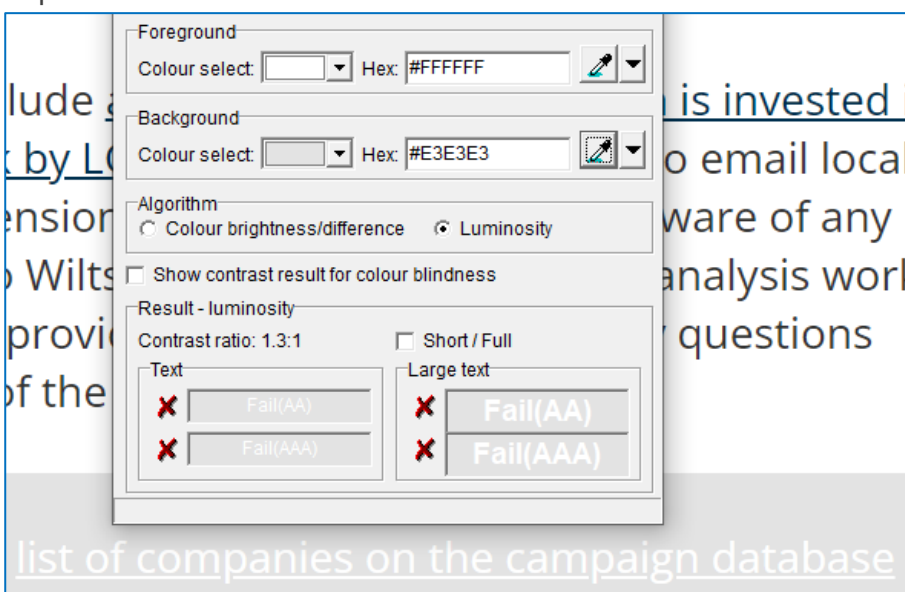
- greater than 18 point (approx. 24px) or
- greater than 14 point (approx. 18.6px) if bolded (font-weight:700 or more).

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

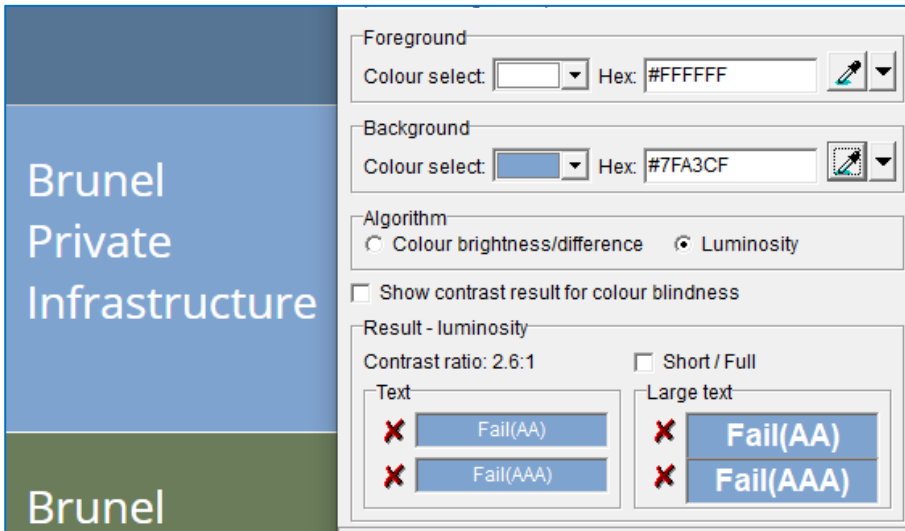
The light grey border of the ‘Search – Find...’ field on a white background on the homepage and throughout the site fails colour contrast requirements with a ratio of 1.6.



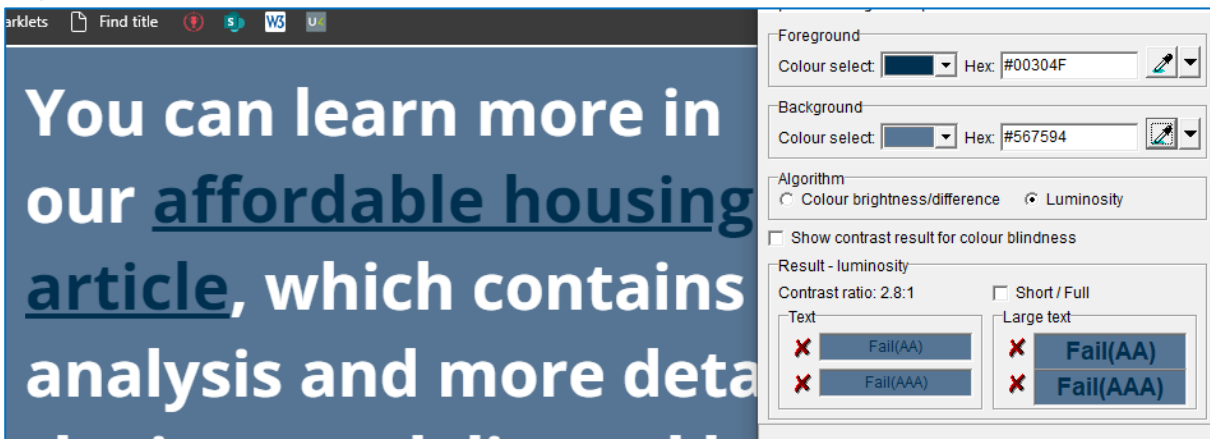
The white text on the light blue background on the ‘Big Livestock’ page fails colour contrast requirements with a ratio of 1:3:1.



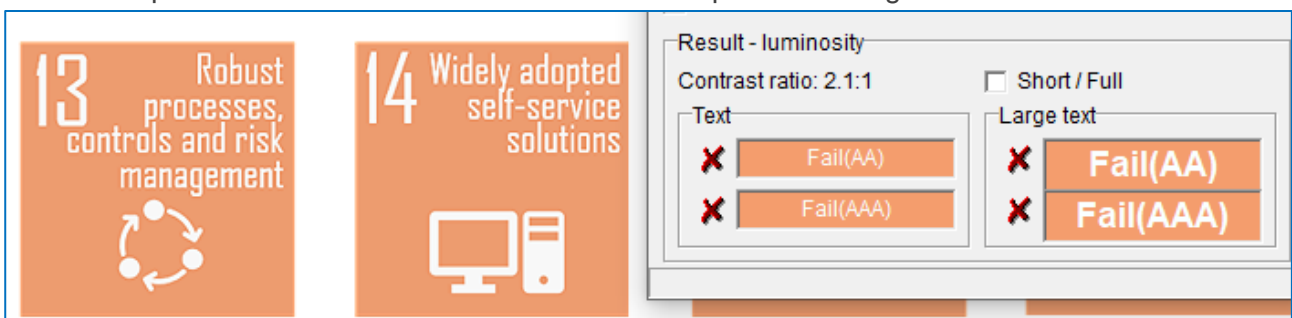
The white text on the blue background on the 'Pooling Progress - Part 2 (private markets)' page fails colour contrast requirements with a ratio of 2:6:1.



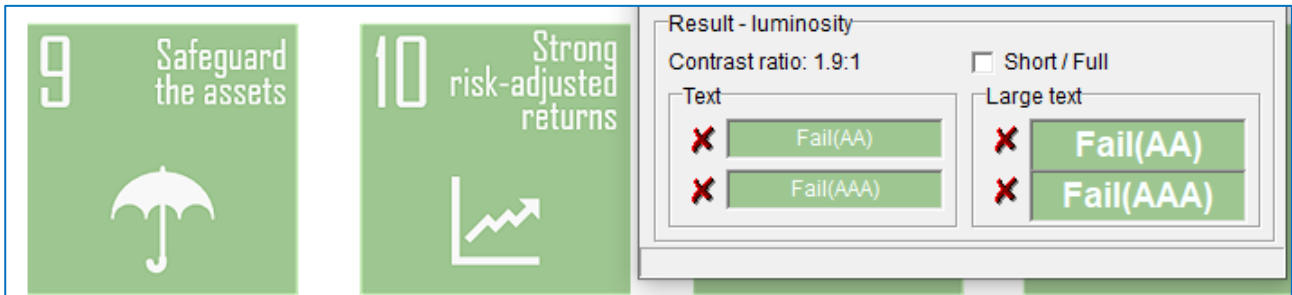
The blue text on the blue background on the 'Affordable Housing Update' page fails colour contrast requirements with a ratio of 2:8:1.



The white text on an orange background on the 'Our vision, goals and values' page fails colour contrast requirements with a ratio of 2.1. This issue is present throughout the site.



The white text on a green background on the 'Our vision, goals and values' page fails colour contrast requirements with a ratio of 1.9. This issue is present throughout the site.



## User Comments

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

Sam Hopkins  
Readability Assessor

## Example Occurrences

<https://wiltshirepensionfund.org.uk/>

<https://www.wiltshirepensionfund.org.uk/Big-Livestock>

<https://www.wiltshirepensionfund.org.uk/article/6449/Pooling-Progress-Part-2-private-markets>

<https://www.wiltshirepensionfund.org.uk/affordable-housing-update>

<https://wiltshirepensionfund.org.uk/Our-vision-goals-and-values>

## Action Required

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

# WCAG References

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

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

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

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

# STAS-F20: Obscured Text

## Description

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

When increasing the size of the text to 200% on the 'How is my LGPS pension calculated?' page, there is a loss of content, and a horizontal scroll bar appears on the table.

**Inflation is added each scheme year (1 April - 31 March)**


The table below is an example:

Start Date	End Date	Opening Balance	Pensionable Pay	Pension Accrued	Closing Balance	Inflation	Total Annual Pension
01/04/2021	15/02/2022	£1,034.22	£25,000.00	£510.20	£1,544.42	3.1	£1,592.29
01/04/2020	31/03/2021	£518.87	£25,000.00	£510.20	£1,029.07	0.5	£1,034.22
01/04/2019	31/03/2020	£0.00	£25,000.00	£510.20	£510.20	1.70	£518.87

**Inflation is added each scheme year (1 April - 31 March)**

The table below is an example:

Start Date	End Date	Opening Balance	Pensionable Pay	Pension Accrued
01/04/2021	15/02/2022	£1,034.22	£25,000.00	£510.20
01/04/2020	31/03/2021	£518.87	£25,000.00	£510.20
01/04/2019	31/03/2020	£0.00	£25,000.00	£510.20



# Example Occurrences

<https://member.wiltshirepensionfund.org.uk/how-pension-calculated>

## Action Required

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

## WCAG References

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

# STAS-F21: Responsive Design

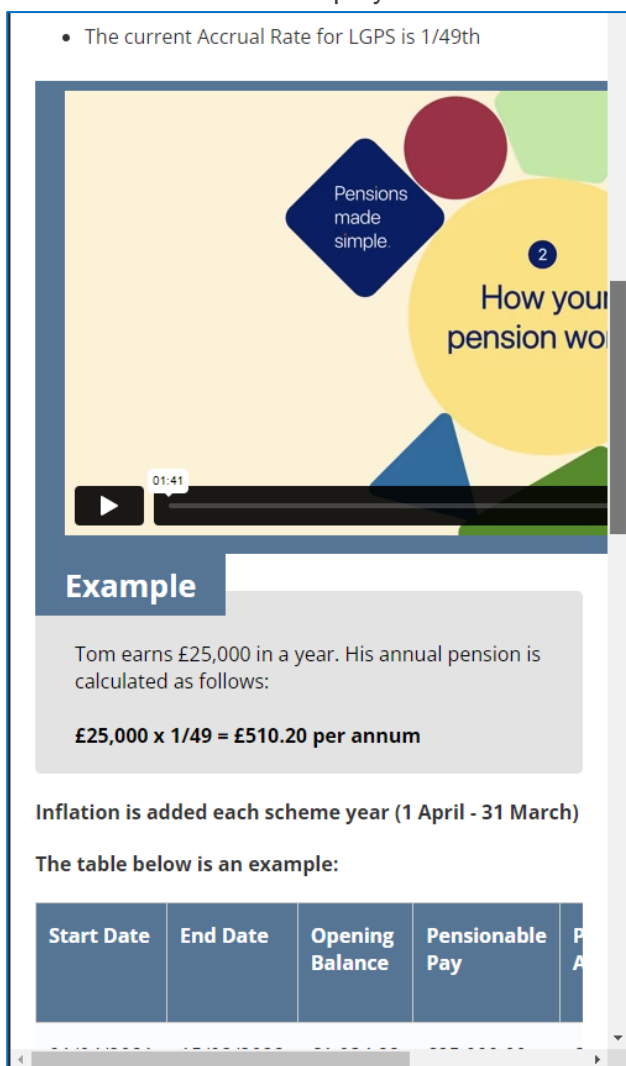
## Description

Users with visual impairments often enlarge web content to make it easier to see. When content is enlarged to 400% zoom or viewed on a screen with a width of 320 CSS pixels, content should be presented to a user with no loss of information or functionality, and without requiring scrolling in two dimensions.

The value of 320 CSS pixels was chosen as a reasonable minimum size that authors could achieve and also replicates the smaller screen sizes of common mobile devices.

The width of 320 CSS pixels exactly corresponds to a desktop browser window set to a width of 1280px and zoomed in to 400%.

When the browser window is set to a width of 320px, some content becomes obscured, and the horizontal scroll bar is displayed.



The screenshot shows a website interface with a video player and an example calculation. The video player has a play button and a progress bar showing 01:41. The example calculation is as follows:

• The current Accrual Rate for LGPS is 1/49th

Pensions made simple

2

How your pension wo

01:41

### Example

Tom earns £25,000 in a year. His annual pension is calculated as follows:

$$\text{£25,000} \times \frac{1}{49} = \text{£510.20 per annum}$$

Inflation is added each scheme year (1 April - 31 March)

The table below is an example:

Start Date	End Date	Opening Balance	Pensionable Pay	P	A
------------	----------	-----------------	-----------------	---	---

# Example Occurrences

<https://member.wiltshirepensionfund.org.uk/how-pension-calculated>

## Action Required

1. Ensure the content reflows when the users viewport changes.
2. Ensure that no content is lost when viewing content at 320px wide or at 400% zoom
3. Ensure that horizontal scrolling is not required when viewing content at 320px wide or at 400% zoom

## WCAG References

**1.4.10 Reflow:** Content can be presented without loss of information or functionality, and without requiring scrolling in two dimensions for: (Level AA)

- Vertical scrolling content at a width equivalent to 320 CSS pixels;
- Horizontal scrolling content at a height equivalent to 256 CSS pixels.

Except for parts of the content which require two-dimensional layout for usage or meaning.

## Further Information

### The relation of Reflow to the Success Criterion 1.4.4 Resize Text

The aim of 1.4.10 Reflow is to enable users to zoom in without having to scroll in two directions.

The aim of 1.4.4 Resize Text is to ensure that users can increase the size of text to at least 200%

These 2 requirements are to be met simultaneously and are not independent of each other.

A user should be able to increase the size of text to 200% even when the information is displayed on a narrow mobile phone screen.

Alternatively, a user should be able to magnify the screen to 400% and increase the text size a further 200%



# STAS-F22: Text does not resize

## Description

Users with visual impairments often have difficulty reading website content due to the size of the text. Small text can be difficult to read for certain people but can be made easier by magnifying the page or enlarging the text itself.

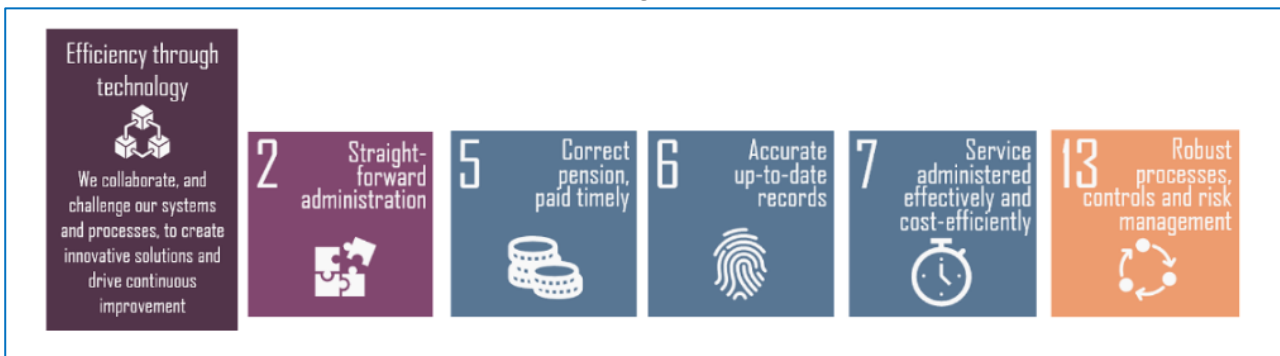
On the 'Our vision, goals and values' page, there are images of text. When increasing the size of the text to 200%, the text of these images does not resize.



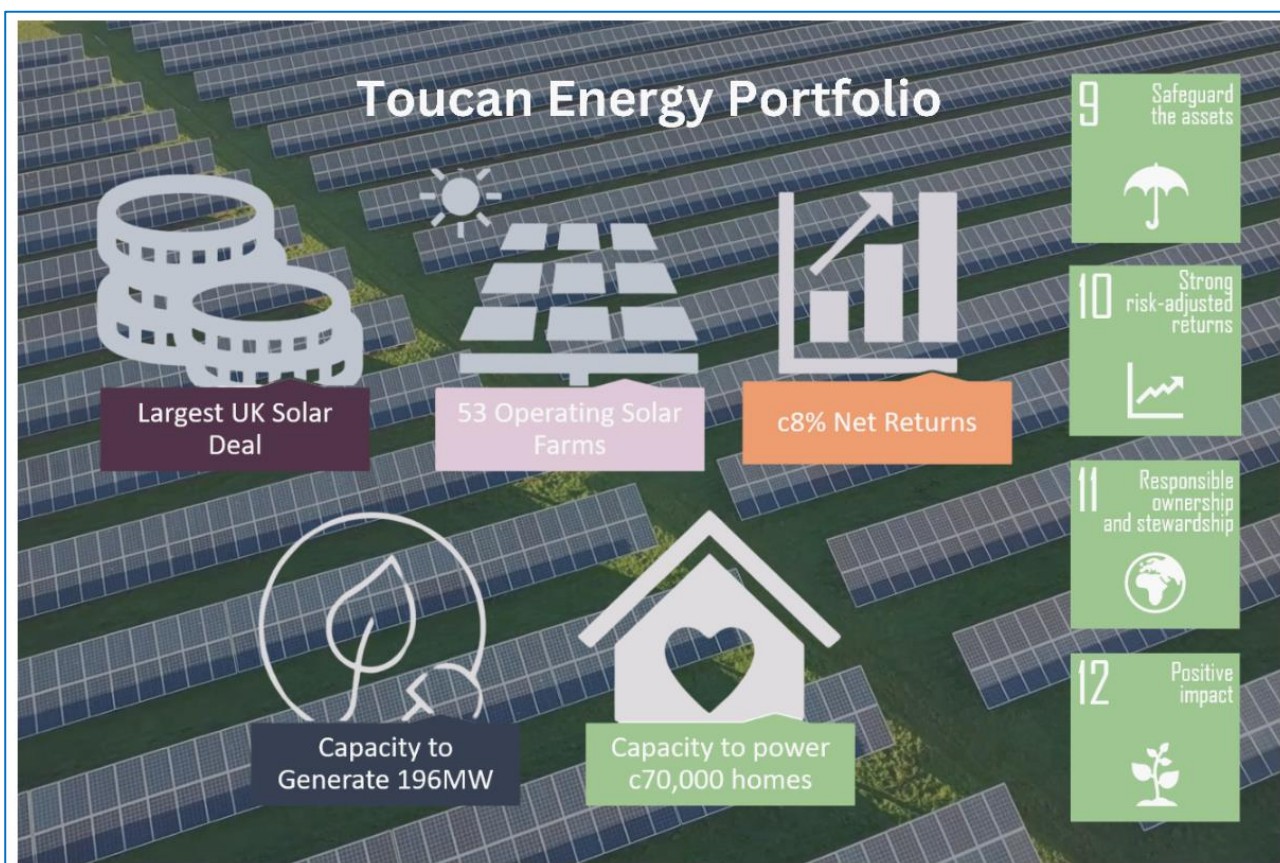
On the 'LGPS Create is here!' page, there are images of text. When increasing the size of the text to 200%, the text of these images does not resize.



On the 'Launch of our integrated payroll system' page, there are images of text. When increasing the size of the text to 200%, the text of these images does not resize.



On the 'Toucan Energy Portfolio, UK's Largest Operational Solar Portfolio Deal!' page, there are images of text. When increasing the size of the text to 200%, the text of these images does not resize.



On the 'Q1 Employers Newsletter - exciting updates and news!' page, there are images of text. When increasing the size of the text to 200%, the text of these images does not resize.



## Occurrences

This issue occurs throughout the site.

## Example Occurrences

<https://wiltshirepensionfund.org.uk/Our-vision-goals-and-values>

<https://www.wiltshirepensionfund.org.uk/LGPS-create-is-here>

<https://www.wiltshirepensionfund.org.uk/Launch-of-our-integrated-payroll-system>

<https://www.wiltshirepensionfund.org.uk/Toucan-Energy-Portfolio-UKs-Largest-Operational-Solar-Portfolio-Deal>

<https://www.wiltshirepensionfund.org.uk/Q1-2024-Employers-Newsletter>

## Action Required

1. Ensure users can resize text without content becoming obscured.

## WCAG References

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

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

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

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

# Advisories

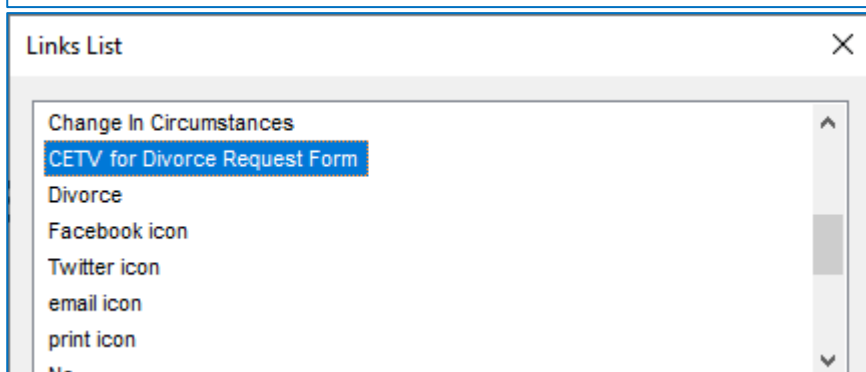
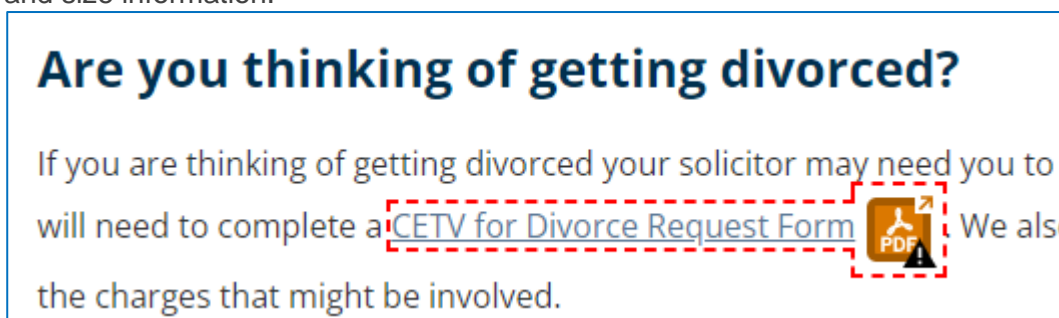
# STAS-A01: Links to Non-HTML Documents

## Description

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

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

On the 'Change in Circumstances' page there are links to PDFs that do not contain the file type and size information.



## User Comments

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

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

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

Alan Sleat

Screen Reader Assessor

## Example Occurrences

<https://member.wiltshirepensionfund.org.uk/article/4660>

## Recommendation

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

# STAS-A02: Accessibility Statement

## Description

An accessibility statement will allow disabled users to check if there are any features implemented on the site to enhance a user's experience. Many users with disabilities will look for the accessibility statement before viewing a site. They would expect to find information on how to use the site, what measures have been taken to ensure accessibility is important, and also any limitations the site may have due to third party applications.

The Government Digital Service recommends that the accessibility statement has the following sections:

- How accessible this website is
- What to do if you cannot access parts of this website
- Reporting accessibility problems with this website
- Enforcement procedure
- Contacting us by phone or visiting us in person
- Technical information about this website's accessibility
- Non accessible content
  - Non-compliance with the accessibility regulations
  - Disproportionate burden
  - Content that's not within the scope of the accessibility regulations
- How we tested this website
- What we're doing to improve accessibility

The accessibility statement on your site is missing several of these sections.

### Accessibility

#### Accessibility statement

This accessibility statement applies to the Wiltshire Pension Fund website.

This website is run by Wiltshire Pension Fund. We want as many people as possible to be able to use this website. For example, that means you should be able to:

- change colours, contrast levels and fonts
- zoom in up to 200% without the text spilling off the screen
- navigate most of the website using just a keyboard
- navigate most of the website using speech recognition software
- listen to most of the website using a screen reader (including the most recent versions of JAWS, NVDA and VoiceOver)

We are also improving the website text to be as simple as possible to understand.

[AbilityNet](#) has advice on making your device easier to use if you have a disability.

#### How accessible is this website?

We know some parts of this website are not fully accessible, including:

- our third party web systems such as My Wiltshire Pension
- most older PDF documents are not fully accessible to screen reader software

Work is ongoing to implement improvements, although in the meantime if you would like any of our documents or publications in another format please email [pensioncommunications@wiltshire.gov.uk](mailto:pensioncommunications@wiltshire.gov.uk)

#### Feedback and contact information

If you need information on this website in a different format like accessible PDF, large print, easy read, audio recording or braille, please...

#### Reporting accessibility problems with this website

We're always looking to improve the accessibility of this website. If you find any problems not listed on this page or think we're not meeting accessibility requirements, please provide your feedback using the links at the bottom of this page.

#### Enforcement procedure

The Equality and Human Rights Commission (EHRC) is responsible for enforcing the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018 (the 'accessibility regulations'). If you're not happy with how we respond to your complaint, please contact the Equality and Advisory Support Service.

#### Technical information about this website's accessibility

Wiltshire Pension Fund is committed to making its website accessible, in accordance with the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018.

This website is partially compliant with the [Web Content Accessibility Guidelines version 2.1](#) AA standard, due to the non-compliances listed below.

#### Non accessible content

Wiltshire Pension Fund have had an accessibility audit carried out and work is ongoing to make improvements according to their recommendations. Please email [pensioncommunications@wiltshire.gov.uk](mailto:pensioncommunications@wiltshire.gov.uk) if you require any of our documents or publications in a different format.

#### What we're doing to improve accessibility

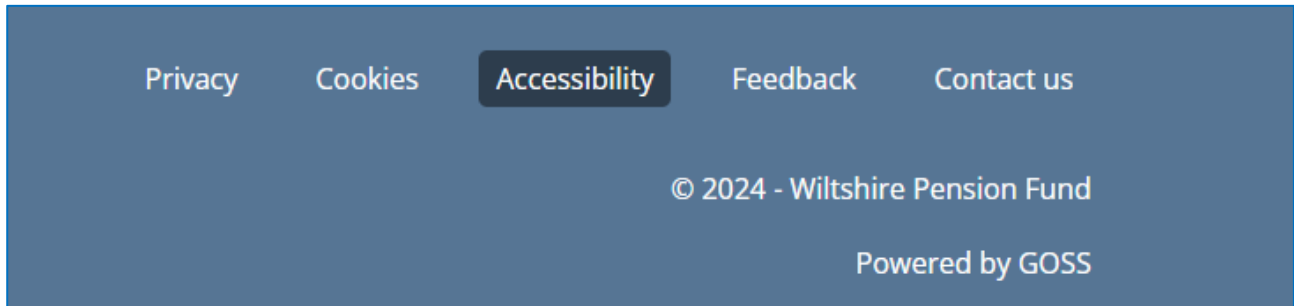
We are committed to making our website accessible. Following assessment from the Shaw Trust work is underway to improve accessibility according to their recommendations.

#### Preparation of this accessibility statement

This statement was prepared on 8 March 2021. This website will be tested by a reputable accessibility testing organisation by the end of 2021.

We will publish the accessibility test report upon completion of the audit.

Furthermore, the 'Accessibility' link is located on the footer of the page when ideally it should be located near the top of the page for ease of access.



## Occurrences

This issue occurred throughout the site

## Example Occurrences

<https://wiltshirepensionfund.org.uk/>

<https://www.wiltshirepensionfund.org.uk/article/3725/Accessibility>

<https://www.wiltshirepensionfund.org.uk/News>

<https://www.wiltshirepensionfund.org.uk/The-Big-Survey-2024>

<https://www.wiltshirepensionfund.org.uk/article/8260/Wiltshire-Pension-Fund-presents-our-Climate-Report-2023-Advancing-Towards-Net-Zero>

## Recommendation

1. Include a descriptive accessibility statement with links from all pages

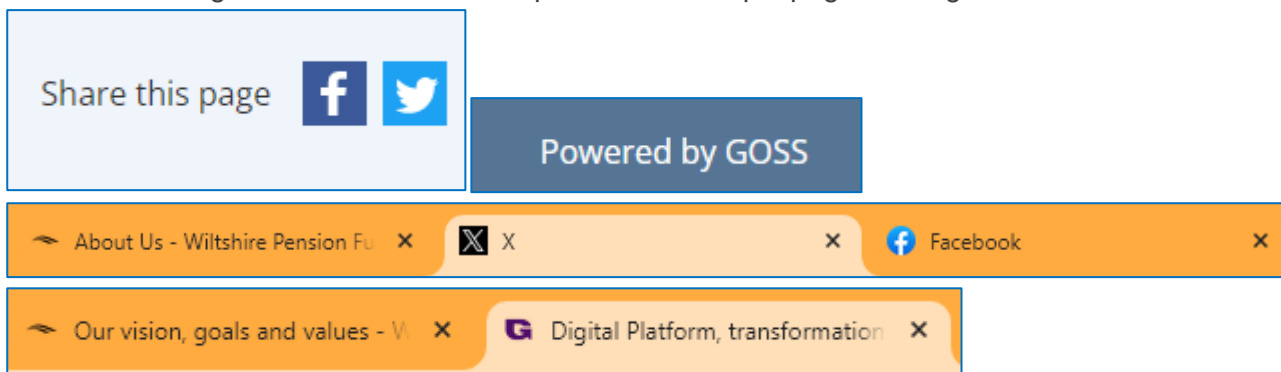


# STAS-A03: Users not notified of Links Opening in a new Window / Tab

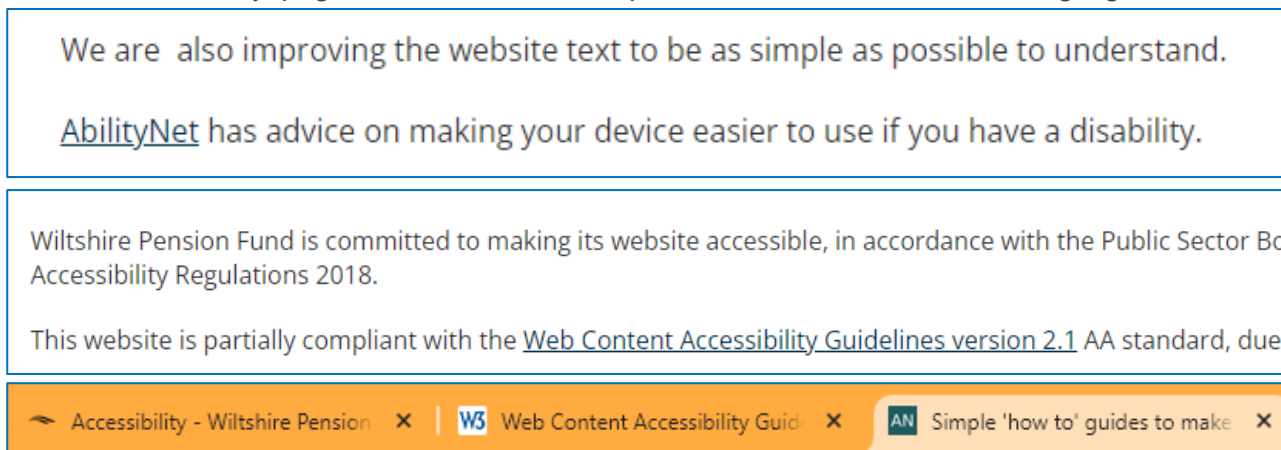
## Description

When a link is activated it can either open the linked content in the same window or it can force the content to appear in a new window or tab. There are a number of links that open in a new window/tab without prior notification. When a new window/tab is utilised the user must be informed of this before they activate any link. If a user is not aware that they have been placed in a new window/tab, this can cause issues when the user attempts to use browser controls to move back a page. As they are in a new window/tab, the only way to get back to the previous page will be to close the current window.

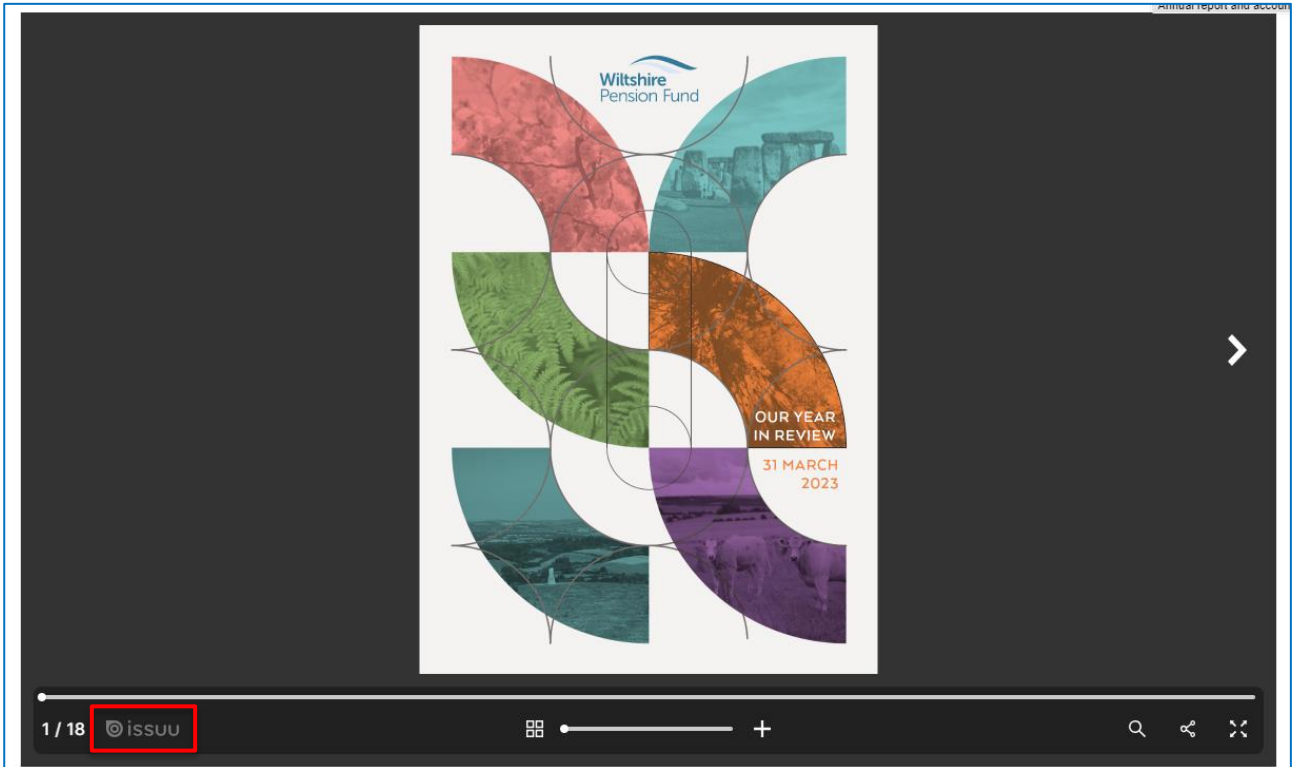
On the 'About Us' page, the social media links and 'Powered by GOSS' link open in a new tab without informing the user. This issue is present on multiple pages throughout the site.



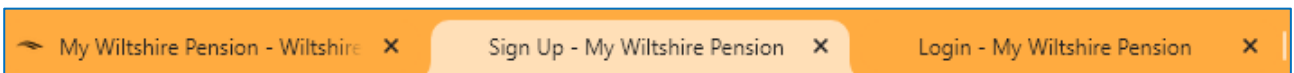
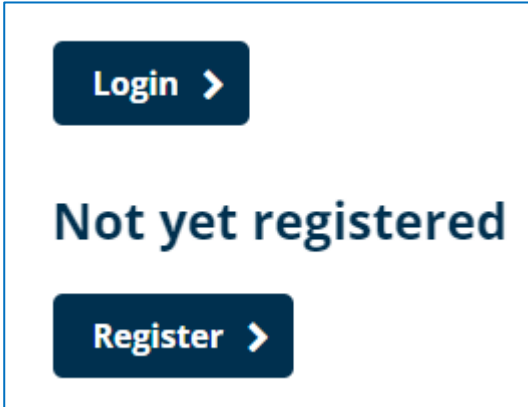
On the 'Accessibility' page, there are links that open in a new tab without informing sighted users.



On the 'Annual report and accounts' page, there are links that open in a new tab without informing the user.



On the 'My Wiltshire Pension' page, there are links that open in a new tab without informing the user.



## Occurrences


This issue occurs throughout the site.

## Example Occurrences

<https://wiltshirepensionfund.org.uk/About-us>

<https://wiltshirepensionfund.org.uk/News>  
<https://wiltshirepensionfund.org.uk/article/3725/Accessibility>  
<https://www.wiltshirepensionfund.org.uk/Annual-report-and-accounts>  
<https://member.wiltshirepensionfund.org.uk/My-Wiltshire-Pension>

## Recommendation

1. Ensure that users are notified of links that open in a new window or tab.
  - a. By adding visual text content to the link, e.g. [BBC \(Opens in a new window\)](#)
  - b. By adding an icon with a suitable alt text to the link text, e.g. [BBC](#) 

```
<a href="https://www.bbc.co.uk">
```

```
  BBC
```

```
</a>
```



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

**Our Vision:**

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

**Our Purpose is to:**

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

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

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

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

A Company Limited by Guarantee. Registered Number 1744121  
Registered Charity Number in England & Wales 287785  
Registered Charity Number in Scotland SC039856

