

# VPAT

*ADA/WCAG/UNI-EN301549  
accessibility statement*



**Client:**

**KASK S.p.a. ad unico socio**

**URL:**

**[vogelnyc.com](http://vogelnyc.com)**

**Date:**

**10/12/2025**



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# 01. Introduction

# 01.1 - About

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

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

· Web Content Accessibility Guidelines 2.0 · Web Content Accessibility Guidelines 2.1 · Web Content Accessibility Guidelines 2.2.

For [more informations read ITI web page](#)

**PLEASE NOTE:** While a VPAT can be an essential aid in assessing the availability of ICT products with accessibility features, it is important to note that, even in cases where a product conforms to relevant standards and technical specifications, an end user may still encounter difficulties utilizing it due to the nature or severity of their disability. On the other hand, a product that may not fully conform to all technical requirements may still be perfectly accessible to an end user who has a disability, but does not need a particular accessibility feature, e.g., a large-button telephone handset for an individual with a hearing disability.

# 01.2 - Test environments

## Operating systems

- Apple Mac Os X (last version)
- Microsoft Windows (last version)
- Apple Ios (last version)
- Google Android (last version)

*We have not used Linux as it is currently very uncommon among users with disabilities.*

## Browsers and user software

In the latest versions available on the different operating systems:

- Google Chrome
- Windows Edge
- Safari
- Adobe Acrobat Reader / Preview on Mac (for PDFs only)

## Screen readers and assistive technologies

In order to achieve the most standard evaluation **we test everything with no adaptation.**

In order to make the most realistic evaluation **we also make some adaptation like:**

- Graphic adaptations present on the different systems (colors, contrasts, subtitles, etc.)
- Mouse emulations, magnifiers and screen keyboards or keyboard improved settings always of the different systems
- Voiceover - Apple systems only
- Talkback - Android only
- NVDA (last version) and Freedom scientific Jaws (second-to-last version) - PC systems only

# 02. Accessibility Conformance Report

## 02.1 - General infos

**Company:** KASK S.p.a. ad unico socio

**Name of Product/Version:** vogelnyc.com

**Report Date:** 10/12/2025

**Product Description:** website

**Contact Information:** info@kask.com

**Evaluation Methods Used:** (see [05.3 - Methodology](#))

### Applicable Standards/Guidelines

|  |  |
|--|--|
| Web Content Accessibility Guidelines 2.0 | Level A (YES)<br>Level AA (YES)<br>Levels AAA (NO) |
| Web Content Accessibility Guidelines 2.1 | Level A (YES)<br>Level AA (YES)<br>Levels AAA (NO) |
| Web Content Accessibility Guidelines 2.2 | Level A (YES)<br>Level AA (YES)<br>Levels AAA (NO) |

### Terms

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

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

- **Not Applicable:** The criterion is not relevant to the product.
- **Not Evaluated:** The product has not been evaluated against the criterion. This can only be used in WCAG Level AAA criteria.

# **03. WCAG 2.x** **Report**

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

# 03.1 - Success Criteria, Level A

| <b>Success Criteria</b>                               | <b>Conformance Level</b> | <b>Remarks and explanations</b>   |
|---|--------------------------|---|
| 1.1.1 Non-text Content                                | Partially supports       | Not all non-text content presented to the user has a text alternative that serves the equivalent purpose.   |
| 1.2.1 Audio-only and Video-only (Prerecorded)         | Supports                 |   |
| 1.2.2 Captions (Prerecorded)                          | Supports                 |   |
| 1.2.3 Audio Description or Media Alternative Supports | Supports                 |   |
| 1.3.1 Info and Relationships                          | Partially supports       | In some cases, information, structure or correlations conveyed by the presentation of pages cannot be determined programmatically (or are not available through text);  |
| 1.3.2 Meaningful Sequence                             | Supports                 |   |
| 1.3.3 Sensory Characteristics                         | Supports                 |   |
| 1.4.1 Use of Color                                    | Supports                 |   |
| 1.4.2 Audio Control                                   | Supports                 |   |
| 2.1.1 Keyboard  | Partially supports       | Some features cannot be activated by keyboard (or similar input interface);   |
| 2.1.2 No Keyboard Trap                                | Supports                 |   |
| 2.1.4 Character Key Shortcuts                         | Supports                 |   |
| 2.2.1 Timing Adjustable                               | Supports                 |   |
| 2.2.2 Pause Stop Hide                                 | Partially supports       | Some animations, flashing, sliding or self-updates of information started automatically, with a duration of more than five seconds or presented in parallel with other content, there are no mechanisms to stop or hide them; |
| 2.3.1 Three Flashes or Below Threshold                | Supports                 |   |
| 2.4.1 Bypass Blocks                                   | Supports                 |   |
| 2.4.2 Page Titled                                     | Supports                 |   |

|                                 |                    |   |
|---------------------------------|--------------------|---|
| 2.4.3 Focus Order               | Supports           |   |
| 2.4.4 Link Purpose (In Context) | Partially supports | The purpose of certain links cannot be determined by the link text or by the link text together with adjacent content;  |
| 2.5.1 Pointer Gestures          | Supports           |   |
| 2.5.2 Pointer Cancellation      | Supports           |   |
| 2.5.3 Label in Name             | Supports           |   |
| 2.5.4 Motion Actuation          | Supports           |   |
| 3.1.1 Language of Page          | Supports           |   |
| 3.2.1 On Focus                  | Supports           |   |
| 3.2.2 On Input                  | Supports           |   |
| 3.2.6 Consistent Help           | Supports           |   |
| 3.3.1 Error Identification      | Supports           |   |
| 3.3.2 Labels or Instructions    | Partially supports | In some cases no labels or instructions are provided when the content requires input actions by the user;   |
| 3.3.7 Redundant Entry           | Supports           |   |
| 4.1.1 Parsing                   | Supports           |   |
| 4.1.2 Name Role Value           | Partially supports | In some cases, user interface components (including: module elements, script-generated links and components), name, role, state, property and values are incorrect or set, or the user a.t are not warned when these attributes change; |

## 03.2 - Success Criteria, Level AA

| Success Criteria                      | Conformance Level  | Remarks and explanations  |
|---------------------------------------|--------------------|---|
| 1.2.4 Captions (Live)                 | Supports           |   |
| 1.2.5 Audio Description (Prerecorded) | Supports           |   |
| 1.3.4 Orientation                     | Supports           |   |
| 1.3.5 Identify Input Purpose          | Supports           |   |
| 1.4.3 Contrast (Minimum)              | Partially supports | Where not allowed, visual representation of text and images containing text does not always have the minimum contrast ratio required ***;   |
| 1.4.4 Resize text                     | Supports           |   |
| 1.4.5 Images of Text                  | Supports           |   |
| 1.4.10 Reflow                         | Partially supports | Content that does not require a representation in two dimensions (such as data tables or maps) does not rearrange when resizing;  |
| 1.4.11 Non-text Contrast              | Partially supports | For some essential components, even in different states, the color contrast compared to adjacent elements does not exceed the ratio of 3:1;   |
| 1.4.12 Text-spacing                   | Partially supports | Changing the spacing of texts relating to the height of the lines, spaces between paragraphs, letters or words, there are certain losses of information or content;   |
| 1.4.13 Content on Hover or Focus      | Partially supports | In some cases, when mouse pointer (hover) passing or keyboard focus make content visible and hidden, there is no mechanism available to hide additional content without moving the mouse pointer or keyboard focus, the pointer cannot be moved to additional content without disappearing or additional content remains visible until the hover or |

|   |                    |   |
|---|--------------------|---|
|   |                    | focus event is removed, the user deletes it or his information is no longer valid except for some exceptions; |
| 2.4.5 Multiple Ways                       | Supports           |   |
| 2.4.6 Headings and Labels                 | Partially supports | Headers and/or labels do not sufficiently clarify content or functionality;                                   |
| 2.4.7 Focus Visible                       | Supports           |   |
| 2.4.11 Focus Not Obscured (Minimum)       | Supports           |   |
| 2.5.7 Dragging Movements                  | Supports           |   |
| 2.5.8 Target Size (Minimum)               | Supports           |   |
| 3.1.2 Language of Parts                   | Supports           |   |
| 3.2.3 Consistent Navigation               | Supports           |   |
| 3.2.4 Consistent Identification           | Supports           |   |
| 3.3.3 Error Suggestion                    | Supports           |   |
| 3.3.4 Error Prevention (LFD)              | Supports           |   |
| 3.3.8 Accessible Authentication (Minimum) | Supports           |   |
| 4.1.3 Status Messages                     | Supports           |   |

# 04. EN 301 549 Report

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

# 04.1 Chapter 4: Functional Performance Statements (FPS)

| <b>Criteria</b>   | <b>Conformance Level</b> | <b>Remarks and explanations</b> |
|---|--------------------------|---------------------------------|
| 4.2.1 Usage without vision                                | Partially Supports       |                                 |
| 4.2.2 Usage with limited vision                           | Partially Supports       |                                 |
| 4.2.3 Usage without perception of colour                  | Partially Supports       |                                 |
| 4.2.4 Usage without hearing                               | Partially Supports       |                                 |
| 4.2.5 Usage with limited hearing                          | Partially Supports       |                                 |
| 4.2.6 Usage with no or limited vocal capability           | Partially Supports       |                                 |
| 4.2.7 Usage with limited manipulation or strength         | Partially Supports       |                                 |
| 4.2.8 Usage with limited reach                            | Partially Supports       |                                 |
| 4.2.9 Minimize photosensitive seizure triggers            | Partially Supports       |                                 |
| 4.2.10 Usage with limited cognition, language or learning | Partially Supports       |                                 |
| 4.2.11 Privacy  | Partially Supports       |                                 |

# 04.2 Chapter 5: Generic Requirements

| Criteria  | Conformance Level                        | Remarks and explanations                      |
|---|--|---|
| <b>5.1 Closed functionality</b>                   | <i>Heading cell no response required</i> | <i>Heading cell no response required</i>      |
| <b>5.1.2 General</b>                              | <i>Heading cell no response required</i> | <i>Heading cell no response required</i>      |
| <b>5.1.2.1 Closed functionality</b>               | <i>See 5.2 through 13</i>                | <i>See information in 5.2 through 13</i>      |
| <b>5.1.2.2 Assistive technology</b>               | <i>See 5.1.3 through 5.1.6</i>           | <i>See information in 5.1.3 through 5.1.6</i> |
| <b>5.1.3 Non-visual access</b>                    | <i>Heading cell no response required</i> | <i>Heading cell no response required</i>      |
| 5.1.3.1 Audio output of visual information        | Not Applicable                           |   |
| 5.1.3.2 Auditory output delivery including speech | Not Applicable                           |   |
| 5.1.3.3 Auditory output correlation               | Not Applicable                           |   |
| 5.1.3.4 Speech output user control                | Not Applicable                           |   |
| 5.1.3.5 Speech output automatic interruption      | Not Applicable                           |   |
| 5.1.3.6 Speech output for non-text content        | Not Applicable                           |   |
| 5.1.3.7 Speech output for video information       | Not Applicable                           |   |
| 5.1.3.8 Masked entry                              | Not Applicable                           |   |
| 5.1.3.9 Private access to personal data           | Not Applicable                           |   |
| 5.1.3.10 Non-interfering audio output             | Not Applicable                           |   |

| <b>Criteria</b>   | <b>Conformance Level</b>                 | <b>Remarks and explanations</b>                    |
|---|--|--|
| 5.1.3.11 Private listening volume                               | Not Applicable                           |  |
| 5.1.3.12 Speaker volume   | Not Applicable                           |  |
| 5.1.3.13 Volume reset   | Not Applicable                           |  |
| 5.1.3.14 Spoken languages                                       | Not Applicable                           |  |
| 5.1.3.15 Non-visual error identification                        | Not Applicable                           |  |
| 5.1.3.16 Receipts, tickets, and transactional outputs           | Not Applicable                           |  |
| 5.1.4 Functionality closed to text enlargement                  | Not Applicable                           |  |
| 5.1.5 Visual output for auditory information                    | Not Applicable                           |  |
| <b>5.1.6 Operation without keyboard interface</b>               | <i>Heading cell no response required</i> | <i>Heading cell no response required</i>           |
| <b>5.1.6.1 Closed functionality</b>                             | <i>See 5.1.3.1 through 5.1.3.16</i>      | <i>See information in 5.1.3.1 through 5.1.3.16</i> |
| 5.1.6.2 Input focus   | Not Applicable                           |  |
| 5.1.7 Access without speech                                     | Not Applicable                           |  |
| 5.2 Activation of accessibility features                        | Not Applicable                           |  |
| 5.3 Biometrics  | Not Applicable                           |  |
| 5.4 Preservation of accessibility information during conversion | Not Applicable                           |  |
| <b>5.5 Operable parts</b>                                       | <i>Heading cell no response required</i> | <i>Heading cell no response required</i>           |
| 5.5.1 Means of operation  | Not Applicable                           |  |
| 5.5.2 Operable parts discernibility                             | Not Applicable                           |  |
| <b>5.6 Locking or toggle controls</b>                           | <i>Heading cell no response required</i> | <i>Heading cell no response required</i>           |
| 5.6.1 Tactile or auditory status                                | Not Applicable                           |  |
| 5.6.2 Visual status   | Not Applicable                           |  |

| Criteria                         | Conformance Level | Remarks and explanations |
|----------------------------------|-------------------|--------------------------|
| 5.7 Key repeat                   | Not Applicable    |                          |
| 5.8 Double-strike key acceptance | Not Applicable    |                          |
| 5.9 Simultaneous user actions    | Not Applicable    |                          |

## 04.3 Chapter 6: ICT with Two-Way Voice Communication

| Criteria   | Conformance Level                        | Remarks and explanations                 |
|--|--|--|
| 6.1 Audio bandwidth for speech                                   | <i>Not Applicable</i>                    |  |
| <b>6.2 Real-time text (RTT) functionality</b>                    | <i>Heading cell no response required</i> | <i>Heading cell no response required</i> |
| 6.2.1.1 RTT communication  | Not Applicable                           |  |
| 6.2.1.2 Concurrent voice and text                                | Not Applicable                           |  |
| 6.2.2.1 Visually distinguishable display                         |  |  |
| 6.2.2.2 Programmatically determinable send and receive direction | Not Applicable                           |  |
| 6.2.2.3 Speaker identification                                   | Not Applicable                           |  |
| 6.2.2.4 Visual indicator of Audio with RTT                       | Not Applicable                           |  |
| 6.2.3 Interoperability   | Not Applicable                           |  |
| 6.2.4 RTT responsiveness   | Not Applicable                           |  |
| 6.3 Caller ID  | Not Applicable                           |  |
| 6.4 Alternatives to voice-based services                         | Not Applicable                           |  |
| <b>6.5 Video communication</b>                                   | <i>Heading cell no response required</i> | <i>Heading cell no response required</i> |
| <b>6.5.1 General (informative)</b>                               | <i>Heading cell no</i>                   | <i>Heading cell no response</i>          |

| Criteria  | Conformance Level                    | Remarks and explanations             |
|---|--------------------------------------|--------------------------------------|
|   | <i>response required</i>             | <i>required</i>                      |
| 6.5.2 Resolution  | Not Applicable                       |                                      |
| 6.5.3 Frame rate  | Not Applicable                       |                                      |
| 6.5.4 Synchronization between audio and video                         | Not Applicable                       |                                      |
| 6.5.5 Visual indicator of audio with video                            | Not Applicable                       |                                      |
| 6.5.6 Speaker identification with video (sign language) communication | Not Applicable                       |                                      |
| 6.6 Alternatives to video-based services (advisory only)              | <i>Advisory no response required</i> | <i>Advisory no response required</i> |

## 04.4 Chapter 7: ICT with Video Capabilities

| Criteria                                 | Conformance Level                        | Remarks and explanations                 |
|--|--|--|
| <b>7.1 Caption processing technology</b> | <i>Heading cell no response required</i> | <i>Heading cell no response required</i> |
| 7.1.1 Captioning playback                | Not Applicable                           |  |
| 7.1.2 Captioning synchronization         | Not Applicable                           |  |
| 7.1.3 Preservation of captioning         | Not Applicable                           |  |
| 7.1.4 Captions characteristics           | Not Applicable                           |  |
| 7.1.5 Spoken subtitles                   | Not Applicable                           |  |
| 7.2.1 Audio description playback         | Not Applicable                           |  |

| Criteria   | Conformance Level | Remarks and explanations |
|--|-------------------|--------------------------|
| 7.2.2 Audio description synchronization              | Not Applicable    |                          |
| 7.2.3 Preservation of audio description              | Not Applicable    |                          |
| 7.3 User controls for captions and audio description | Not Applicable    |                          |

## 04.5 Chapter 8: Hardware

| Criteria  | Conformance Level                        | Remarks and explanations                 |
|---|--|--|
| <b>8.1.1 Generic requirements</b>               | <i>Heading cell no response required</i> | <i>Heading cell no response required</i> |
| 8.1.2 Standard connections                      | Not Applicable                           |  |
| 8.1.3 Colour                                    | Not Applicable                           |  |
| <b>8.2 Hardware products with speech output</b> | <i>Heading cell no response required</i> | <i>Heading cell no response required</i> |
| 8.2.1.1 Speech volume range                     | Not Applicable                           |  |
| 8.2.1.2 Incremental volume control              | Not Applicable                           |  |
| 8.2.2.1 Fixed-line devices                      | Not Applicable                           |  |
| 8.2.2.2 Wireless communication devices          | Not Applicable                           |  |
| <b>8.3 Stationary ICT</b>                       | <i>Heading cell no response required</i> | <i>Heading cell no response required</i> |
| 8.3.2.1 Unobstructed high forward reach         | Not Applicable                           |  |
| 8.3.2.2 Unobstructed low forward reach          | Not Applicable                           |  |
| 8.3.2.3.1 Clear space                           | Not Applicable                           |  |
| 8.3.2.3.2 Obstructed (< 510 mm) forward reach   | Not Applicable                           |  |

| <b>Criteria</b>                                  | <b>Conformance Level</b>                 | <b>Remarks and explanations</b>          |
|--|--|--|
| 8.3.2.3.3 Obstructed (< 635 mm) forward reach    | Not Applicable                           |  |
| 8.3.2.4 Knee and toe clearance width             | Not Applicable                           |  |
| 8.3.2.5 Toe clearance                            | Not Applicable                           |  |
| 8.3.2.6 Knee clearance                           | Not Applicable                           |  |
| 8.3.3.1 Unobstructed high side reach             | Not Applicable                           |  |
| 8.3.3.2 Unobstructed low side reach              | Not Applicable                           |  |
| 8.3.3.3.1 Obstructed ( $\leq 255$ mm) side reach | Not Applicable                           |  |
| 8.3.3.3.2 Obstructed ( $\leq 610$ mm) side reach | Not Applicable                           |  |
| 8.3.4.1 Change in level                          | Not Applicable                           |  |
| 8.3.4.2 Clear floor or ground space              | Not Applicable                           |  |
| 8.3.4.3.2 Forward approach                       | Not Applicable                           |  |
| 8.3.4.3.3 Parallel approach                      | Not Applicable                           |  |
| 8.3.5 Visibility                                 | Not Applicable                           |  |
| 8.3.6 Installation instructions                  | Not Applicable                           |  |
| <b>8.4 Mechanically Operable parts</b>           | <i>Heading cell no response required</i> | <i>Heading cell no response required</i> |
| 8.4.1 Numeric keys                               | Not Applicable                           |  |
| 8.4.2.1 Means of operation of mechanical parts   | Not Applicable                           |  |
| 8.4.2.2 Force of operation of mechanical parts   | Not Applicable                           |  |
| 8.4.3 Keys, tickets and fare cards               | Not Applicable                           |  |
| 8.5 Tactile indication of speech mode            | Not Applicable                           |  |

## 04.6 Chapter 9: Web (see WCAG 2.x section)

## 04.7 Chapter 10: Non-Web Documents

| Criteria                          | Conformance Level                        | Remarks and explanations                 |
|-----------------------------------|--|--|
| <b>10.0 General (informative)</b> | <i>Heading cell no response required</i> | <i>Heading cell no response required</i> |
| 10.1.1.1 through 10.4.1.3         | See WCAG 2.x section                     | See information in WCAG 2.x section      |
| 10.5 Caption positioning          | Not Applicable                           |  |
| 10.6 Audio description timing     | Not Applicable                           |  |

## 04.8 Chapter 11: Software

| Criteria   | Conformance Level                        | Remarks and explanations                 |
|--|--|--|
| <b>11.0 General (informative)</b>                      | <i>Heading cell no response required</i> | <i>Heading cell no response required</i> |
| 11.1.1.1 through 11.4.1.3                              | See WCAG 2.x section                     | See information in WCAG 2.x section      |
| <b>11.5 Interoperability with assistive technology</b> | <i>Heading cell no response required</i> | <i>Heading cell no response required</i> |

| <b>Criteria</b>   | <b>Conformance Level</b>                      | <b>Remarks and explanations</b>               |
|---|---|---|
| <b>11.5.1 Closed functionality</b>  | <i>Heading cell no response required</i>      | <i>Heading cell no response required</i>      |
| <b>11.5.2 Accessibility services</b>  | <i>Heading cell no response required</i>      | <i>Heading cell no response required</i>      |
| 11.5.2.1 Platform accessibility service support for software that provides a user interface | See 11.5.2.5 through 11.5.2.17                | See information in 11.5.2.5 through 11.5.2.17 |
| 11.5.2.2 Platform accessibility service support for assistive technologies                  | See 11.5.2.5 through 11.5.2.17                | See information in 11.5.2.5 through 11.5.2.17 |
| 11.5.2.3 Use of accessibility services  | See information in 11.5.2.5 through 11.5.2.17 | See information in 11.5.2.5 through 11.5.2.17 |
| 11.5.2.4 Assistive technology   | Not Applicable                                |   |
| 11.5.2.5 Object information   | Not Applicable                                |   |
| 1.5.2.6 Row, column, and headers  | Not Applicable                                |   |
| 11.5.2.7 Values   | Not Applicable                                |   |
| 11.5.2.8 Label relationships  | Not Applicable                                |   |
| 11.5.2.9 Parent-child relationships   | Not Applicable                                |   |
| 11.5.2.10 Text  | Not Applicable                                |   |
| 11.5.2.11 List of available actions   | Not Applicable                                |   |
| 11.5.2.12 Execution of available actions  | Not Applicable                                |   |
| 11.5.2.13 Tracking of focus and selection attributes  | Not Applicable                                |   |
| 11.5.2.14 Modification of focus and selection attributes                                    | Not Applicable                                |   |
| 11.5.2.15 Change notification   | Not Applicable                                |   |
| 11.5.2.16 Modifications of states and properties  | Not Applicable                                |   |
| 11.5.2.17 Modifications of values and text  | Not Applicable                                |   |
| <b>11.6 Documented accessibility usage</b>  | <i>Heading cell no</i>                        | <i>Heading cell no response</i>               |

| Criteria  | Conformance Level   | Remarks and explanations                 |
|---|---|--|
|   | <i>response required</i>  | <i>required</i>                          |
| 11.6.1 User control of accessibility features                       | Not Applicable  |  |
| 11.6.2 No disruption of accessibility features                      | Not Applicable  |  |
| 11.7 User preferences   | Not Applicable  |  |
| <b>11.8 Authoring tools</b>   | <i>Heading cell no response required</i>                                | <i>Heading cell no response required</i> |
| <b>11.8.1 Content technology</b>                                    | <i>Heading cell no response required</i>                                | <i>Heading cell no response required</i> |
| 11.8.2 Accessible content creation                                  | See WCAG 2.x section<br>(If not authoring tool, enter "Not Applicable") | See information in WCAG 2.x section      |
| 11.8.3 Preservation of accessibility information in transformations | Not Applicable  |  |
| 11.8.4 Repair assistance  | Not Applicable  |  |
| 11.8.5 Templates  | Not Applicable  |  |

## 04.9 Chapter 12: Documentation and Support Services

| Criteria  | Conformance Level                        | Remarks and explanations                 |
|---|--|--|
| <b>12.1 Product documentation</b>               | <i>Heading cell no response required</i> | <i>Heading cell no response required</i> |
| 12.1.1 Accessibility and compatibility features | Not Applicable                           |  |
| 12.1.2 Accessible documentation                 | See WCAG 2.x                             | See information in WCAG 2.x              |

| Criteria   | Conformance Level                        | Remarks and explanations                 |
|--|--|--|
|  | section                                  | section                                  |
| <b>12.2 Support Services</b>                                   | <i>Heading cell no response required</i> | <i>Heading cell no response required</i> |
| 12.2.2 Information on accessibility and compatibility features | Not Applicable                           |  |
| 12.2.3 Effective communication                                 | Not Applicable                           |  |
| 12.2.4 Accessible documentation                                | See WCAG 2.x section                     | See information in WCAG 2.x section      |

## 04.10 Chapter 13: ICT Providing Relay or Emergency Service Access

| Criteria                                | Conformance Level                        | Remarks and explanations                 |
|---|--|--|
| <b>13.1 Relay services requirements</b> | <i>Heading cell no response required</i> | <i>Heading cell no response required</i> |
| 13.1.2 Text relay services              | Not Applicable                           |  |
| 13.1.3 Sign relay services              | Not Applicable                           |  |
| 13.1.4 Lip-reading relay services       | Not Applicable                           |  |
| 13.1.5 Captioned telephony services     | Not Applicable                           |  |
| 13.1.6 Speech to speech relay services  | Not Applicable                           |  |
| 13.2 Access to relay services           | Not Applicable                           |  |
| 13.3 Access to emergency services       | Not Applicable                           |  |

# 05. Annexes

# 05.1 - Web accessibility

Disability is defined as: any activity limitation or participation restriction in society, experienced by a person as a result of a substantial, lasting or definitive alteration of one or more physical, sensory, mental, cognitive, or psychic functions, a multiple disability, or a disabling health condition (article L. 114 of the Social Action and Families Code).

Web accessibility consists of making online public communication services accessible to people with disabilities, and is based on four fundamental principles:

**Perceivable:** Information and user interface components must be presented to the user in such a way that they can perceive them. For example, providing textual equivalents for all non-textual content that can then be presented in other forms according to the user's needs: large characters, braille, speech synthesis, symbols or simplified language.

**Operable:** User interface and navigation components must be operable. For example, making all functionality available via keyboard.

**Understandable:** Information and the use of the user interface must be understandable. Textual content must be made readable and navigation must be consistent.

**Robust:** Content must be sufficiently robust to be reliably interpreted by a wide variety of user agents, including assistive technologies.

# 05.2 - WCAG

## WCAG overview

The Web Content Accessibility Guidelines, more commonly referred to as WCAG, is a set of guidelines developed with the aim of making web content more accessible to people with disabilities. It is developed by the World Wide Web Consortium (W3C), an international organization that develops open standards to ensure the long-term growth of the Web. The W3C's Web Accessibility Initiative (WAI) specifically handles the development and management of the WCAG.

The WCAG guidelines are globally recognized and adopted as the standard for digital accessibility. They have undergone multiple revisions since the release of WCAG 1.0 in 1999, with WCAG 2.0 being published in 2008, WCAG 2.1 in 2018, and WCAG 2.2 in 2023. These updates aim to account for changes in technology and a better understanding of different accessibility needs.

## Levels of Conformance

The WCAG guidelines are divided into three levels of conformance: A (lowest), AA (midrange), and AAA (highest). Each level has specific criteria that must be satisfied to achieve that level of conformance. The guidelines are designed this way to meet the needs of different individuals and situations, with Level A addressing the most severe and limiting accessibility issues, and Level AAA addressing more comprehensive accessibility considerations.

It's important to remember that while WCAG is an excellent guideline and standard, achieving 100% compliance with WCAG does not necessarily mean a website is completely accessible to all users. It's crucial to complement these guidelines with user testing and continual reassessment of your site's accessibility needs.

## Accessibility web page

An accessibility page on a website is a place where website owners can detail the measures they have taken to make their website accessible to individuals with disabilities. This is a best-practice in web design and development to enhance digital accessibility. Here are a few components you might often find on an accessibility page:

- **Commitment Statement:** This is a formal statement where the business or organization expresses its commitment to digital accessibility.
- **Standards Compliance:** This is where the website indicates the accessibility standards it adheres to, such as WCAG 2.1 Level AA. This may also include information about how the site has been tested for compliance with these standards.
- **Accessibility Features:** A rundown of the main accessibility features of the site, such as keyboard shortcuts, text size options, color contrast options, etc.
- **Instructions for Using Accessibility Features:** Detailed instructions on how to use the site's accessibility features, like how to turn on captions or use keyboard navigation.
- **Contact and Feedback:** Information on how to contact the website team to report accessibility issues, request accommodations, or provide feedback on the site's accessibility.
- **Update and Revision Date:** The date of the last update to the accessibility page or compliance information.

It's important to remember that the presence of an accessibility page doesn't guarantee in itself that the site is accessible, but it's an indicator of the company's commitment to digital accessibility.

# 05.3 - Methodology

## Objective manual and semi-automatic verification methodology

We analyze content with different automatic and semiautomatic systems and compare the results between tools to obtain the most complete and objective verification. The reference standard, unless specifically requested, that we use is always the latest (WCAG 2.x) so that we can ensure compliance in all countries from which the touchpoint (site, app, etc.) can be accessed.

Our verification is therefore compliant with WCAG 2.x level AA, and the requirements in UNI EN 301549 Guidelines or their declination in the French RGAA. Each tool produces results that are then analyzed by our experts: it is, therefore, possible that not all tool results appear because they are judged to be false negatives.

## Automated tools for syntax checking

- **W3C Markup Validation Service** : used with generated code, because it is the official tool for checking HTML, XHTML, MathHTML, etc.
- **W3C CSS Validation service** : although the correctness of the CSS does not affect accessibility, it could affect some aspects that still have an impact on it if not correctly interpreted because it is incorrect. The verification is therefore appropriate and done with W3C CSS Validation
- **PAC PDF checker**

## Automatic and semi-automatic tools for color verification

- **Color Contrast Analyser (CCA)** : used punctually on dubious contrasts
- **WCAG Color contrast checker** : used as the first check to verify the contrasts of the colors used in the CSS of the pages.
- **Text on background image a11y check** : used to check when text should overlap images
- **Color contrast accessibility evaluator** : used as an additional control for some online pages

## Automatic and semi-automatic tools for checking accessibility

Some online validators used as samples on the pages:

- Accescan
- Wave

And other local tools:

- **Web developer toolbar:** Used to support manual verification. It allowed us to locate images without alt texts, fields without labels, etc.
- **AXE e Lighthouse for Chrome:** they have provided us with precise indications on the defects of the accessibility of the HTML code but also on WAI ARIA attributes, fundamental in the case of web applications and interactive components.
- **Siteimprove for Chrome:** like AX, it provides useful indications for verifying compliance but is a tool evaluated by AgID useful for monitoring public sites.

## Terms

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

**Supports:** The functionality of the product has at least one method that meets the criterion without known defects or meets with equivalent facilitation.

**Partially Supports:** Some functionality of the product does not meet the criterion.

**Does Not Support:** The majority of product functionality does not meet the criterion.

**Not Applicable:** The criterion is not relevant to the product.

**Not Evaluated:** The product has not been evaluated against the criterion. This can only be used in WCAG Level AAA criteria.

## Compliance levels

To meet the needs of various groups and different contexts, three levels of compliance have been defined: A (lowest), AA, and AAA (highest).

**Level A Criterion :** Minimum level. Impacts the experience of a wide range of users / often requires simple implementation techniques.

**Level AA Criterion :** Improved accessibility level. Impacts a smaller group of users / may require more specific implementation techniques.

**Level AAA Criterion :** Maximum level of accessibility, suitable only for certain contexts.