Ministry
of Digital Transformation
of Ukraine

DIA Support Project

Sweden
Sverige

UNDP

Web Accessibility of Government Authorities' Websites

Report on monitoring results

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

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Content

Introduction

This report presents the results of the accessibility monitoring of 100 government websites, conducted for the fourth consecutive year to assess web accessibility and to provide recommendations for addressing the identified shortcomings. The monitoring was carried out using the methodology developed in 2021 at the request of the United Nations Development Programme (UNDP) in Ukraine. The methodology is based on the principles of the Web Content Accessibility Guidelines (WCAG) 2.1 – the international standards for web accessibility. It includes clear guidelines that government authorities can use independently to assess basic accessibility of their websites. Full methodology is provided in Annex 2 to this report.

Since 2021, UNDP in Ukraine, in partnership with the Ministry of Digital Transformation of Ukraine and with the support of Sweden, has been actively promoted the development of digital accessibility in the country. Over this period, a national web accessibility standard – **DSTU EN 301 549:2022**, based on the corresponding European standard – was adopted; an official Ukrainian translation of WCAG 2.1 was developed to facilitate its use by civil servants and developers; and the Web Accessibility educational series was created for the Diia.Education platform, along with the Quick Guide to Web Accessibility. In addition, numerous sociological and analytical studies have been conducted in cooperation with relevant public authorities to identify the needs of persons with disabilities in the context of digital services and to outline priorities of public policy in this area. The research materials are available on the Diia.Barrier-Free webpage.

In July 2023, the government adopted Resolution No. 757 "Some Issues of Accessibility of Information and Communication Systems and Electronic Documents" requiring all websites and mobile applications of executive authorities, as well as the electronic documents hosted on those resources, to comply with the above-mentioned DSTU EN 301 549:2022 standard.

In August 2024, the Ministry of Digital Transformation of Ukraine, together with UNDP in Ukraine, established the **Digital Accessibility Competence Centre** (hereinafter – the Competence Centre) at the Diia state enterprise. This was an important step to promote a centralised and systematic approach to regulating web accessibility requirements at the national level.

The goal of the Competence Centre is to support government authorities, project managers and developers in ensuring the inclusiveness of digital resources and services for all Ukrainians.

In autumn 2024, the Competence Centre jointly with UNDP took part for the first time in conducting the monitoring of accessibility of 100 government websites, applying the methodology developed in 2021.

Throughout the year, with support from UNDP and the Government of Sweden, a series of training sessions was also delivered for civil servants at various levels. In total, more than 2,000 professionals were introduced to the basic web accessibility requirements. Raising awareness of civil servants in this field is a key element in creating an inclusive digital environment.

Similar to previous years, the findings of this year's monitoring showcase gradual improvements in the implementation of accessibility requirements by government bodies. However, the identified shortcomings highlight the need for a systematic approach to the implementation and enforcement of digital accessibility requirements at the national level. In particular, this includes strengthening monitoring and control mechanisms and expanding information and educational activities for raising public awareness of the importance of digital inclusion.

An important note is that currently, digital accessibility requirements in Ukraine apply to websites, mobile applications, and electronic documents of executive authorities and their subordinate institutions. For other authorities, including local self-government bodies, these requirements are advisory in nature. Furthermore, they do not cover digital services in the private sector, as provided for by the European Accessibility Act (Directive 2019/882), which will enter into force in the European Union in 2025. In light of this, further efforts are needed to harmonise Ukrainian legislation with European standards, in particular by improving the regulatory framework and developing a dedicated draft law on digital accessibility.

Monitoring methodology

The methodology for monitoring the government websites' accessibility involves checking the indicator of basic accessibility using automatic website scanning with help of special tools (currently, the Accessibility Insights for Web plugin is used) and conducting simple manual tests. The monitoring procedure does not require any special knowledge.

The basic accessibility indicator includes the following criteria:

1. Sufficient text contrast.
2. Availability of alternative text for all images.
3. Availability of accessible text for all hyperlinks.
4. Availability of text labels for all buttons.
5. Availability of text labels for form fields.
6. Software determination of main language of the page.
7. Lack of errors in the page code.
8. Quick access to main content of the page.
9. Keyboard focus marking.
10. Support for keyboard control.

The degree of achievement of the indicator and its criteria is assessed on the basis of estimation data obtained as a result of visual inspection of website pages and analysis of their code using special plugins designed to check accessibility.

To verify criteria 1-7, this monitoring used automatic analysis of a web page using the Accessibility Insights[1] extension for Google Chrome browser. Criteria 8-10 are checked manually.

If, according to the estimation data, a criterion of the indicator:

1) **is achieved**, the measurement coefficient of the indicator criterion is set to "1". In this case, the score is equal to 1 point;

2) **is not achieved** or no estimation data is available, the measurement coefficient of the indicator is set to "0". In this case, the score is equal to 0 points.

The basic accessibility indicator is equal to the sum of points for all its criteria. The minimum value of the indicator is 0 points; the maximum value is 10 points.

The basic accessibility indicator is used to calculate the level of basic accessibility of a website:

0-3 points	Low level
4-6 points	Average level
7-8 points	Sufficient level
9-10 points	High level

Summary of the monitoring

Between 1 October and 20 November 2024, a comprehensive analysis was conducted to assess the accessibility of 100 websites of Ukraine's central and local executive authorities. The main goal was to determine the level of basic accessibility of these websites and to compare the results with similar studies carried out in 2021-2023. The 2024 sample included the same 100 websites assessed in 2023, ensuring a proper comparison of results across the two years. As in previous years, only the main page of each website was evaluated, placing all websites – from large portals to single-page services – on equal footing.

During the study, only three websites received the maximum score of 10 points, similar to 2023. However, the number of websites with a high level of basic accessibility (9 points) increased, indicating a gradual improvement in overall web accessibility in the public sector.

Table 1. Websites by basic accessibility levels in 2021-2024

Accessibility level	2021	2022	2023	2024
High	1	3	4	7
Sufficient	12	17	18	17
Average	48	53	51	55
Low	39	27	27	21

Chart 1. Websites by basic accessibility levels in 2021-2024
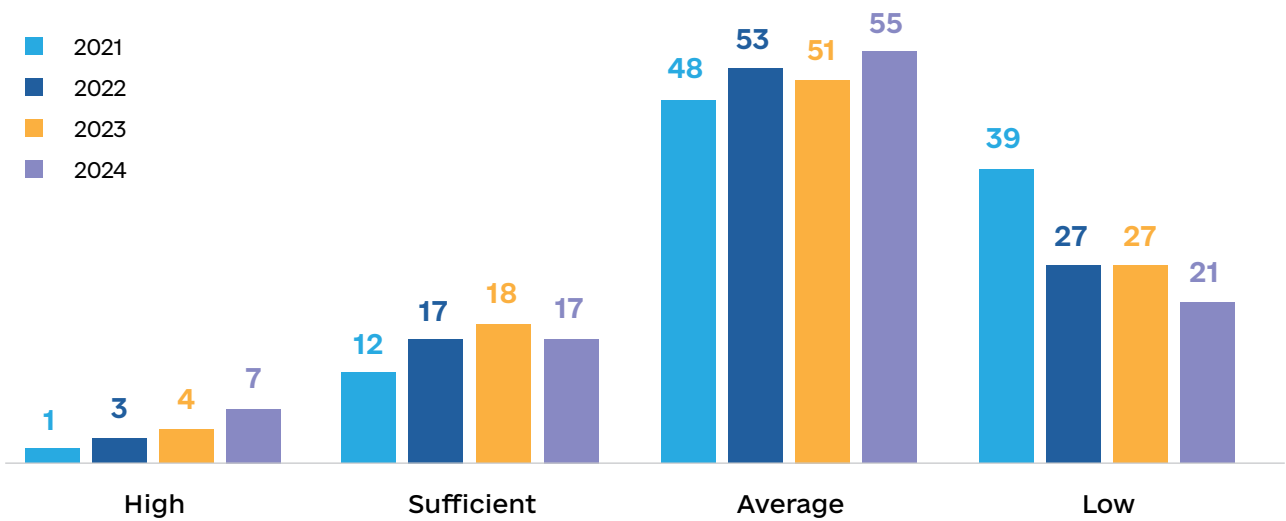
Overall, over the past four years, we have seen a trend of improved level of basic website accessibility. The number of websites with a low level of accessibility has gradually decreased (from 39 in 2021 to 21 in 2024), while the number of websites with a high level of accessibility has increased from 1 to 7. The share of websites with an average level of accessibility has remained the largest, standing at around 50%.

Distribution of websites by basic accessibility levels

According to the study, 7 websites have a high level of accessibility (3 percentage points higher than in 2023), 17 have a sufficient level (1 percentage point lower than in 2023), 55 websites demonstrate an average level of accessibility (4 percentage points higher than last year), and 21 websites have a low level of accessibility (6 percentage points lower than in 2023).

Table 2. Websites by basic accessibility levels (2024)

Accessibility level	Number of websites	Change compared to 2023
High	7	+3%
Sufficient	17	−1%
Average	55	+4%
Low	21	−6%

Chart 2. Websites by basic accessibility levels (2024)
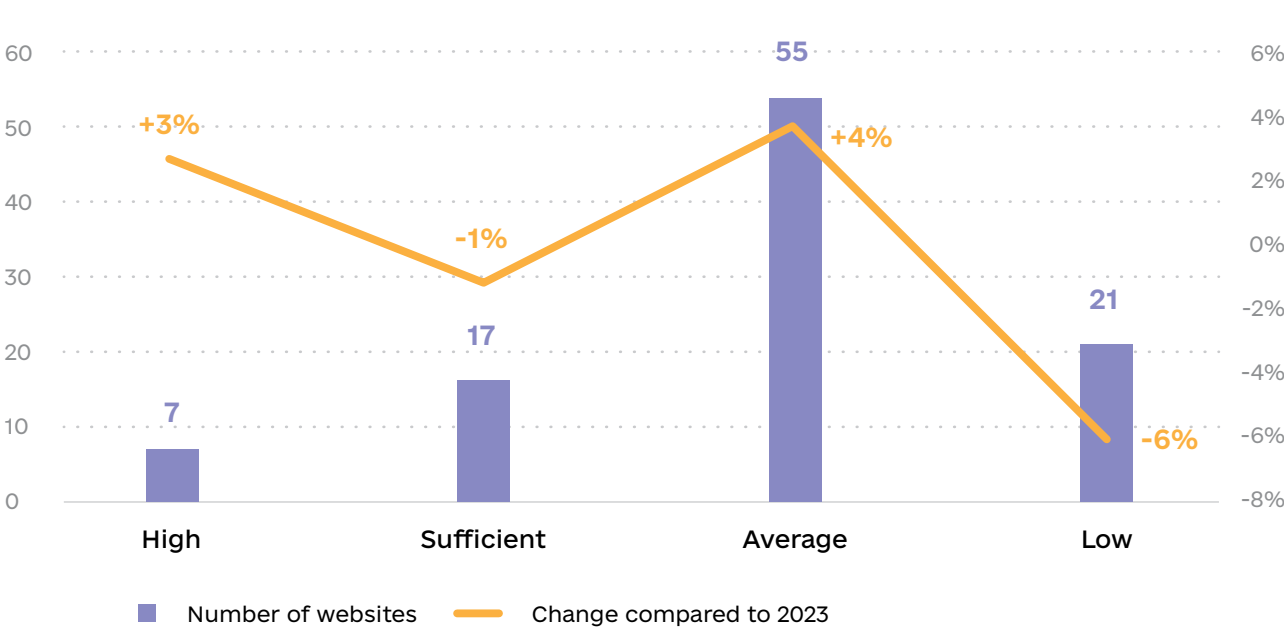
Top performers in basic accessibility

A high level of basic accessibility was recorded on the following websites: **Diia.Barrier-Free** (https://bf.diia.gov.ua), **Vinnytsia State Oblast Administration** (http://www.vin.gov.ua), **Lviv State Oblast Administration** (https://loda.gov.ua), **Kharkiv State Oblast Administration** (https://kharkivoda.gov.ua), **Diia.Education** (https://osvita.diia.gov.ua), **National Bank of Ukraine** (https://bank.gov.ua), **Electronic Court** (https://id.court.gov.ua).

Diia.Barrier-Free	**Vinnytsia State Oblast Administration**	**Lviv State Oblast Administration**	**Kharkiv State Oblast Administration**
Diia.Education	**National Bank of Ukraine**	**Electronic Court**	

Dynamics by total number of websites

A comparison of website accessibility monitoring results for 2023 and 2024 shows that 19 websites improved their accessibility levels, while 17 showed a decline. The remaining 64 websites recorded no change.

Among the websites that improved their basic accessibility score, 2 increased it by 6 points; one website improved by 5, 4, and 3 points each; 4 websites improved by 2 points; and 10, by 1 point.

Chart 3. Progress in achieving basic accessibility, 2023-2024
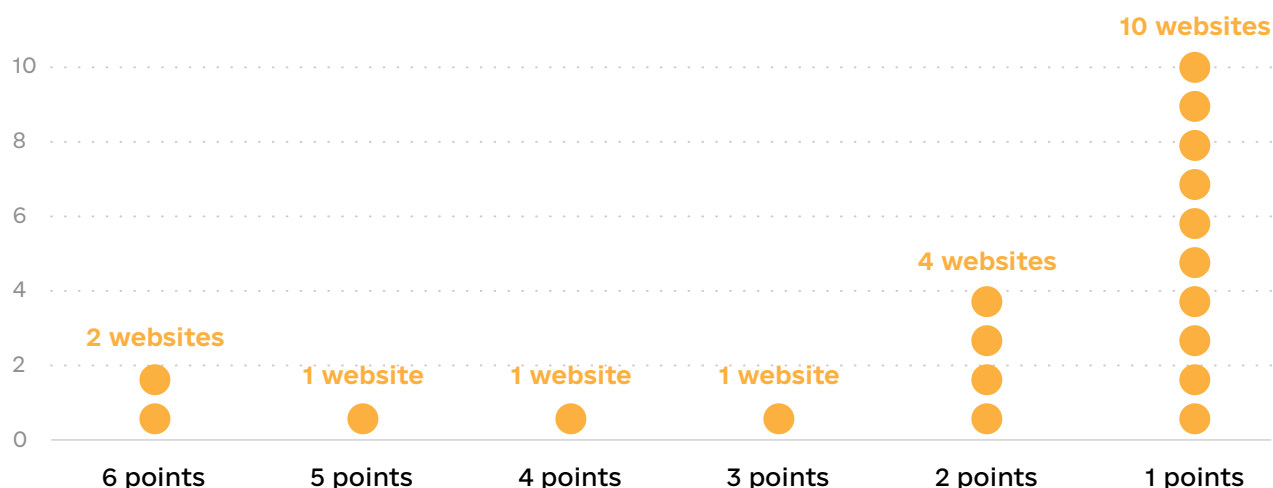
Among the websites with basic accessibility score increased compared to last year's monitoring, the top performers are:

1. **Diia web portal** (+ 6 points);
2. **Diia.Education** (+6 points);
3. **Ministry of Education and Science of Ukraine** (+5 points).

Among the websites with scores declined, only one dropped by 2 points, while 16 websites saw a decrease of 1 point. These minor declines showcase an overall stability in accessibility levels. A one-point difference can often be explained by the dynamic nature of the website content.

Common accessibility errors

As evidenced by the analysis of overall basic accessibility scores, most websites still fall short on four key components: **C8 "Quick access to main content of the page"**, **C9 "Keyboard focus marking"**, **C1 "Sufficient text contrast"**, and **C3 "Availability of accessible text for all hyperlinks"**. These remain the most problematic areas in terms of accessibility on government websites. This year, component **C7 "Lack of errors in the page code"** is no longer included in the list of unmet components since over 50 percent websites are now compliant with it. Below is a description of the most common accessibility errors encountered by users.

1. **Lack of a quick access to main content of the page**. This creates difficulties for visually impaired users and users with motor impairments. The "access to main content" link often does not function properly (if present), or is entirely absent from many websites.

2. **Lack of a visible keyboard focus marking**. The lack of a visible keyboard focus marking prevents people with motor impairments or visually impaired from effectively navigating via keyboard. In most cases, the focus marking is completely missing, or it only appears on interactive elements, making it impossible to identify during keyboard navigation.

3. **Low text contrast**. Insufficient text contrast makes it difficult for people with visual impairments to read content on websites. WCAG 2.1 sets the minimum text contrast requirement at 4.5 to 1, but many websites still do not meet this standard. However, it is worth noting that compliance with this component has significantly improved since 2021.

4. **Lack of accessible text for hyperlinks**. Users of assistive technologies, such as screen readers, cannot identify hyperlinks if they are presented as images (icons, pictograms, or banners) without corresponding text labels.

Even where the relevant requirements have been met, the study shows that certain barriers to accessibility still persist:

1. While most images on websites include alternative text, it often fails to serve its purpose. Instead of describing the image, the text typically repeats the article title or contains technical information, providing no value to users with visual impairments.

2. Special versions of websites for visually impaired users often fail to meet several accessibility criteria. For instance, the activation button (commonly shown as an eye symbol) is not accessible via keyboard (criterion C10), and links or buttons lack appropriate text labels (criteria C3 or C4).

3. The biggest challenges for keyboard navigation are caused by drop-down menus activated on mouse hover. These menus usually cannot be expanded via keyboard, and keyboard focus often shifts to hidden menu items, significantly hindering navigation.

Dynamics of achieving the indicators for the entire period

Both positive and negative changes are recorded in the dynamics of achieving basic accessibility indicators in 2021-2024. The best progress was recorded in the following components:

- C1 (Sufficient text contrast) – from 16% in 2021 to 39% in 2024 (+23 percentage points);

- C6 (Software determination of main language of the page) – from 39% to 60% (+21 percentage points);

- C3 (Availability of accessible text for all hyperlinks) – from 21% to 39% (+18 percentage points).

Chart 4. Dynamics in achieving the indicators in 2021-2024

	C1 Sufficient text contrast	C6 Software determination of main language of the page	C3 Avaliability of accessible text for all hyperlinks
2021	16%	39%	21%
2024	39%	60%	39%
Change over 2021-2023 p.	+23	+21	+18
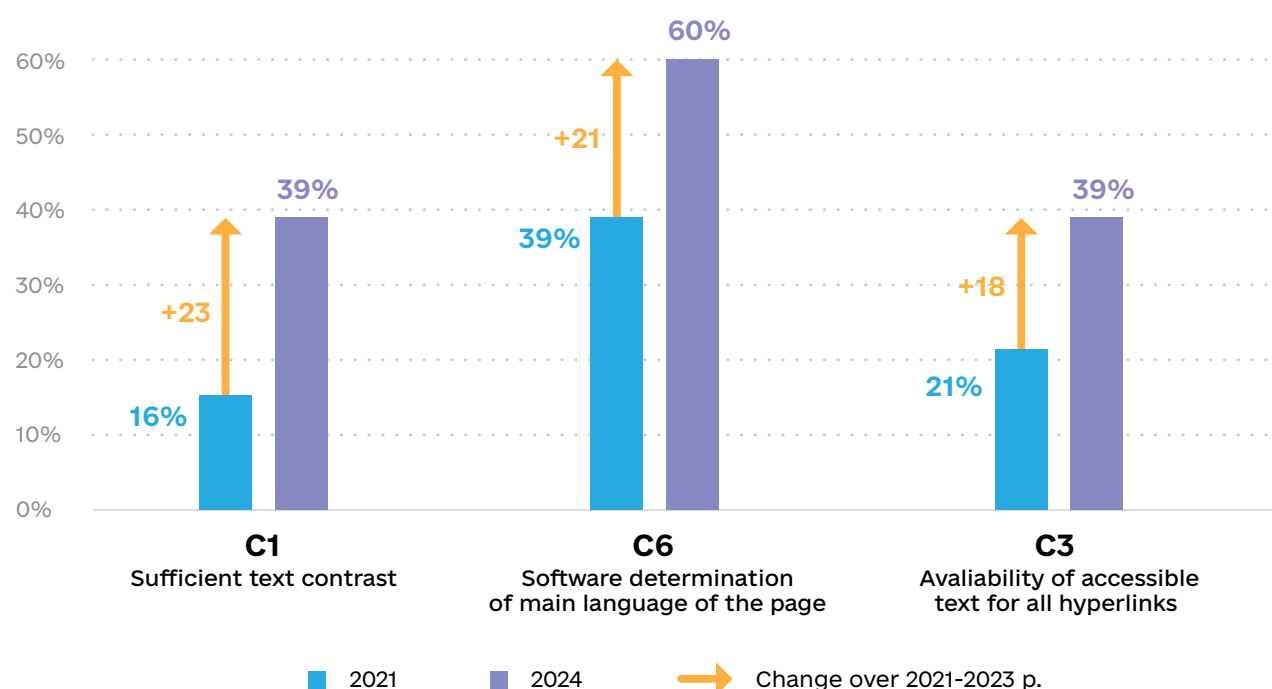
However, when it comes to **C10 indicator "Support for keyboard control"**, the dynamic is negative: compared to 2021, its achievement level decreased by 7 percentage points.

Table 3. Dynamics of achievement of indicators over 2021-2024

Component	2024	2023	2022	2021	Progress over year	Progress over time
1. Sufficient text contrast	39	33	29	16	6	23
2. Availability of alternative text for all images	62	58	57	51	4	11
3. Availability of accessible text for all hyperlinks	39	35	30	21	4	18
4. Availability of text labels for all buttons	69	66	64	60	3	9
5. Availability of text labels for form fields	85	86	85	75	-1	10
6. Software determination of main language of the page	60	56	56	39	4	21
7. Lack of errors in the page code	52	48	48	54	4	-2
8. Quick access to main content of the page	18	19	16	13	-1	5
9. Keyboard focus marking	33	33	30	27	0	6
10. Support for keyboard control	59	58	67	66	1	-7

Chart 5. Dynamics of achievement of components for the period 2021–2024

Legend: 2021, 2022, 2023, 2024, Progress in a year, Progress over time
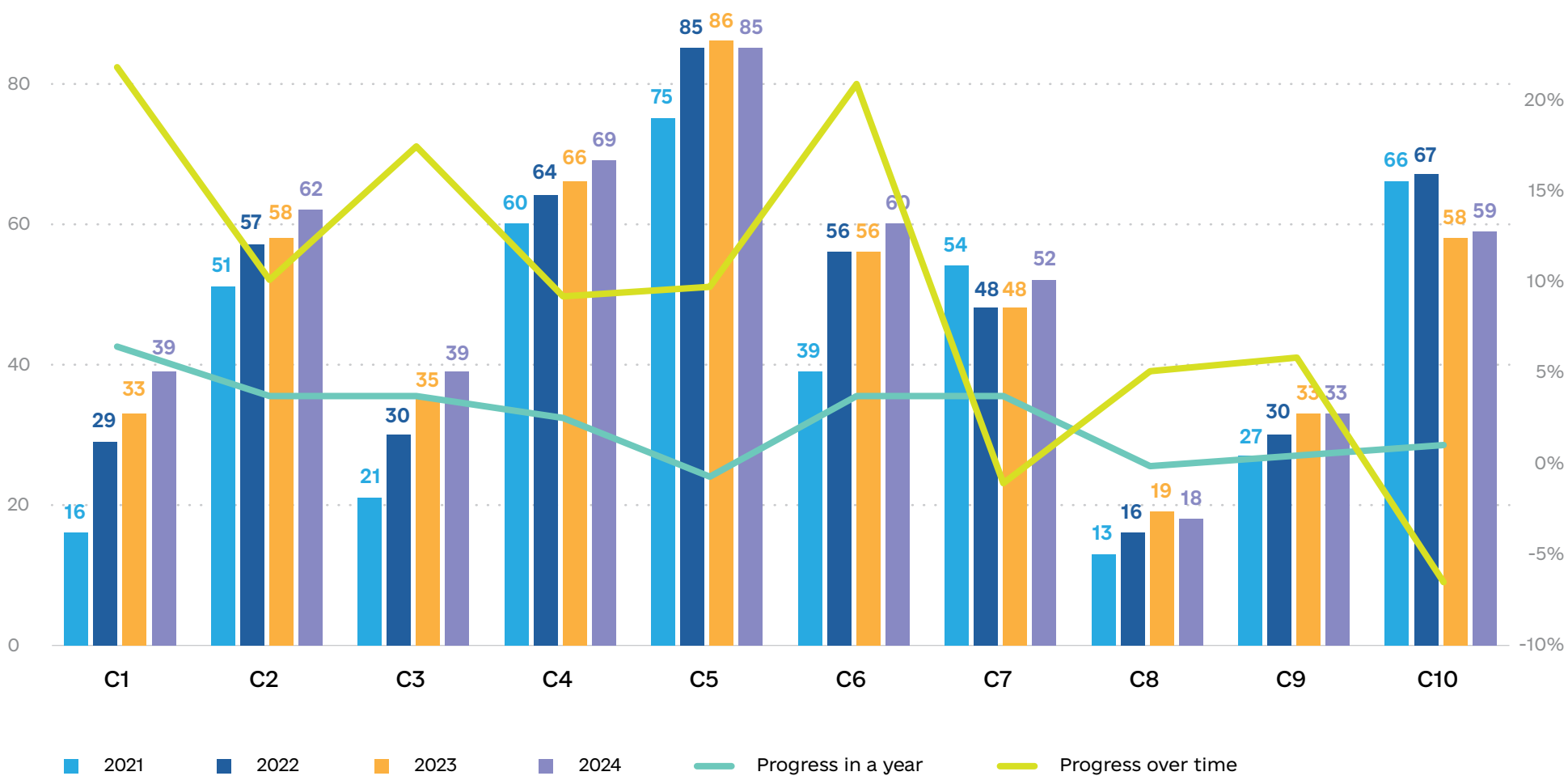
Conclusions and recommendations

Conclusions

The findings of the study indicate that despite noticeable progress, significant challenges persist in web accessibility of Ukrainian government bodies. Of the 100 websites examined, 97 still fail to meet all the minimum accessibility requirements set out by both national and international standards. That is, a large number of government web resources have barriers that hinder or entirely prevent access to electronic services for certain user groups, particularly people with disabilities.

At the same time, the 2024 monitoring of government websites in Ukraine noted some positive developments. Specifically, the number of websites demonstrating a high level of basic accessibility increased from 4 to 7. This suggests that administrators of government websites are gradually implementing necessary changes to improve accessibility. A positive trend has been observed throughout all four years of monitoring, although the rate of progress remains modest.

The study further shows that achieving full compliance with accessibility standards requires a systematic approach from both website administrators and developers. This process involves several key stages: conducting an accessibility assessment/audit, developing a technical brief based on identified issues, and implementing necessary changes – modernisation of the website. Ensuring accessibility of government digital resources for all citizens of Ukraine will only be possible through coordinated efforts and appropriate measures.

Recommendations

The key recommendations for improving the accessibility of websites are based on an analysis of identified shortcomings and trends in the changes.

1. Administrators of websites with low or medium accessibility levels are advised to initiate comprehensive modernisation efforts that take into account the criteria outlined in DSTU EN 301 549:2022. Particular attention should be paid to addressing the most problematic indicators – C1 (sufficient text contrast), C8 (quick access to main content of the page), and C9 (keyboard focus marking).

2. Administrators of websites with sufficient or high levels of accessibility are encouraged to address any remaining issues during their next planned upgrade to achieve full compliance with accessibility standards. This may include refining hyperlink text, improving text contrast, enhancing keyboard navigation mechanisms, and manually checking aspects not covered by this monitoring – such as the quality of alternative text labels for images, availability of subtitles for videos, and correct use of headings and lists to outline the content.

3. All administrators of government websites, regardless of their current level of accessibility, are advised to carry out regular comprehensive accessibility audits that go beyond the 10 basic indicators assessed in this study. These audits should cover all criteria of WCAG 2.1 Level AA, as specified in DSTU EN 301 549:2022. It will help identify and eliminate accessibility barriers that may arise as a result of updates or structural changes to websites.

4. Ongoing awareness-raising and training among web developers responsible for maintaining government websites remains essential. Trainings and other educational initiatives should be organised to increase understanding of the importance of accessibility and how to achieve it.

5. Monitoring of compliance with accessibility standards should be strengthened. It is vital that adherence to DSTU EN 301 549:2022 be continuously monitored, both by developers and by the government institutions responsible for digital transformation.

Technical recommendations on the reasons for non-achieving the indicators

Based on the analysis of the errors that prevent websites from meeting the basic accessibility indicators, a set of technical recommendations has been developed. These should be taken into account during website modernisation.

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

Recommendations for eliminating the reasons for non-achieving indicator 1 "Sufficient text contrast"

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

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

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

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

Recommendations for eliminating the reasons for non-achieving indicator 2 "Availability of alternative text for all images"

Typical errors:

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

How to fix them:

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

Recommendations for eliminating the reasons for non-achieving indicator 3 "Availability of accessible text for all hyperlinks"

Typical errors:

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

How to fix them:

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

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

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

Recommendations for eliminating the reasons for non-achieving indicator 4 "Availability of text labels for all buttons"

Typical errors:

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

How to fix them:

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

Recommendations for eliminating the reasons for non-achieving indicator 5 "Availability of text labels for form fields"

Typical errors:

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

How to fix them:

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

Recommendations for eliminating the reasons for not achieving indicator 6 "Software determination of main language of the page"

Typical errors:

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

How to fix them:

- To establish lang attribute for the **<html>** element with the correct value:

    a) on pages with Ukrainian language content, it is necessary to set the attribute **lang = "uk"**.
    ***Note**: the value "ua" is incorrect;*

    б) on pages with English language content, it is necessary to set **lang = "en"**.

Recommendations for eliminating the reasons for not achieving indicator 7 "Lack of errors in the page code"

Typical errors:

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

How to fix them:

- It is not permissible to use multiple elements with the same identifier (**id** attribute) on a single page.
- Make sure that if you use **ARIA** markup on your site, its implementation complies with the **WAI-ARIA** specification[2].

Recommendations for eliminating the reasons for not achieving indicator 8 "Quick access to main content of the page"

Typical errors:

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

How to fix them:

- Add a link in the header of the website for quick access to the main content[3].

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

Recommendations for eliminating the reasons for not achieving indicator 9 "Keyboard focus marking"

Typical errors:

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

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2   WAI-ARIA Overview. https://www.w3.org/WAI/standards-guidelines/aria/
3   Skip Navigation Links. https://webaim.org/techniques/skipnav/

How to fix them:

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

Recommendations for eliminating the reasons for not achieving indicator 10 "Support for keyboard control"

Typical errors:

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

How to fix them:

- Standard interactive elements such as buttons (**<button>**), links (**<a href ="">**), fields (**<input>**), selection lists (**<select>**), etc. are always available for keyboard control. This feature is supported on all operating systems. Accessibility issues are usually associated with the use of custom interactive elements. Therefore, it is recommended to use standard interactive elements whenever possible.
- When utilizing a custom interactive element, ensure that it includes the **tabindex="0"** attribute.
- For complex custom interactive elements (such as combo boxes, radio buttons, or carousels), ensure that the role, state, and other properties are appropriately conveyed to assistive technologies through the use of **ARIA**. It is recommended to compare the ARIA markup on your website with the sample on the **WAI-ARIA** site[4].

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4   WAI-ARIA practices. https://www.w3.org/TR/wai-aria-practices-1.1/

Appendix 1.
Technical report on monitoring results

I. General information

Name of the indicator	Basic accessibility
Reporting period from	October 1, 2023
Reporting period to	November 30, 2023.
Data source	Browser: Google Chrome 118.0.0.0. Browser extension: Accessibility Insights for Web 2.40.0 (axe-core 4.7.2)

II. Websites, indicator criteria and their scores

Table 1 shows the results of the assessment of criteria of basic accessibility indicator for 100 websites.

Abbreviations used in Table 1:

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

BA 2024 — score of basic accessibility for 2023 (current year).

BA 2022 – score of basic accessibility for 2022.

BA 2021 – score of basic accessibility for 2021.

Progress / year – the difference between scores of basic accessibility for 2023 and 2022.

Progress / 2 years – the difference between scores of basic accessibility for 2023 and 2021.

N/A – comparison results are not available, since the website was not assessed in respective year.

Table 1. Detailed monitoring results

#	Reference	Name	C1	C2	C3	C4	C5	C6	C7	C8	C9	C10	BA 2024	BA 2023	BA 2022	BA 2021	Progress / year	Progress / 2 years
1.	https://www.kmu.gov.ua/	Website of the Cabinet of Ministers	0	1	0	1	0	0	0	1	0	1	4	4	4	4	0	0
2.	https://www.president.gov.ua/	Official website of the President of Ukraine	1	1	0	0	1	0	0	0	0	0	3	3	2	2	0	1
3.	https://www.rada.gov.ua/	Official web portal of the Verkhovna Rada of Ukraine	0	1	0	1	0	0	0	0	0	0	2	2	3	2	0	0
4.	https://ssu.gov.ua/	Website of the Security Service of Ukraine	0	1	0	1	0	1	0	0	0	0	3	3	4	3	0	0
5.	https://bank.gov.ua/	Website of the National Bank of Ukraine	1	1	1	1	1	1	1	1	1	0	9	7	6	5	2	4
6.	https://minagro.gov.ua	Ministry of Agrarian Policy and Food	0	1	1	1	0	0	0	0	0	0	3	3	4	2	0	1
7.	https://mev.gov.ua	Ministry of Energy of Ukraine	0	1	0	0	1	1	0	1	1	0	5	5	6	1	0	4
8.	https://minre.gov.ua/	Ministry of Reintegration of Temporarily Occupied Territories	0	0	0	1	1	1	1	0	1	0	5	5	6	6	0	-1
9.	https://mms.gov.ua/	Ministry of Youth and Sports of Ukraine	1	1	0	1	1	0	0	0	0	1	5	5	5	5	0	0
10.	https://thedigital.gov.ua/	Ministry of Digital Transformation of Ukraine	0	1	0	1	1	1	0	0	0	1	5	6	6	5	-1	0
11.	https://www.me.gov.ua/	Ministry of Economy of Ukraine	1	1	1	1	1	1	0	0	1	0	7	7	3	3	0	4
12.	http://mvs.gov.ua/	Ministry of Internal Affairs of Ukraine	1	1	1	1	1	1	0	0	1	1	8	5	6	5	3	3
13.	https://mepr.gov.ua/	Ministry of Environmental Protection and Natural Resources of Ukraine	0	0	0	1	1	1	0	0	1	0	4	3	2	3	1	1
14.	https://mfa.gov.ua/	Ministry of Foreign Affairs of Ukraine	0	0	0	0	0	0	0	0	0	1	1	1	2	2	0	-1

#	Reference	Name	C1	C2	C3	C4	C5	C6	C7	C8	C9	C10	BA 2024	BA 2023	BA 2022	BA 2021	Progress / year	Progress / 2 years
15.	https://mtu.gov.ua/	Ministry of Community Development, Territories and Infrastructure of Ukraine	1	0	0	0	1	0	1	0	0	1	4	5	4	3	-1	1
16.	https://mkip.gov.ua/	Ministry of Culture and Information Policy of Ukraine	0	1	0	1	1	1	1	0	0	1	6	5	4	4	1	2
17.	https://www.mil.gov.ua/	Ministry of Defense of Ukraine	0	0	0	1	1	1	1	0	1	0	5	5	6	3	0	2
18.	https://mon.gov.ua/ua	Ministry of Education and Science of Ukraine	1	1	1	1	1	0	0	1	1	1	8	3	5	3	5	5
19.	https://moz.gov.ua/	Ministry of Health of Ukraine	0	1	0	1	1	1	0	0	0	0	4	2	3	4	2	0
20.	https://dsp.gov.ua/	State Labor Service of Ukraine	0	0	0	1	1	1	1	0	1	0	5	5	N	N	0	-
21.	https://www.msp.gov.ua/	Ministry of Social Policy of Ukraine	1	1	0	1	1	1	0	0	0	1	6	6	7	4	0	2
22.	https://mva.gov.ua/	Ministry of Veteran Affairs of Ukraine	0	0	0	1	0	1	1	0	1	1	5	3	3	3	2	2
23.	https://mof.gov.ua/uk	Ministry of Finance of Ukraine	0	1	1	1	1	1	1	0	0	1	7	6	6	6	1	1
24.	https://minjust.gov.ua/	Ministry of Justice of Ukraine	0	0	1	0	1	1	0	0	0	1	4	4	4	4	0	0
25.	https://mspu.gov.ua	Ministry of Strategic Industries of Ukraine	0	1	0	0	1	0	0	0	0	1	3	3	3	4	0	-1
26.	https://id.gov.ua/	Integrated electronic identification system	0	0	1	1	1	0	1	0	0	1	5	5	5	5	0	0
27.	https://data.gov.ua/	Unified state web portal of open data	1	0	1	1	1	0	1	0	0	1	6	5	5	5	1	1
28.	https://diia.gov.ua	Nationwide service Diia	1	1	1	1	1	1	0	1	1	0	8	2	2	2	6	6
29.	https://osvita.diia.gov.ua	Diia.Education	1	1	1	1	1	1	1	0	1	1	9	3	2	2	6	7
30.	https://business.diia.gov.ua	Diia.Business	0	1	1	0	0	1	1	0	0	1	5	7	7	7	-2	-2
31.	https://court.gov.ua/fair/	Search for court cases	0	1	0	1	1	1	0	0	0	0	4	4	5	N	0	-
32.	https://guide.diia.gov.ua/	Guide to public services	1	0	1	1	1	1	0	0	0	0	5	5	5	6	0	-1
33.	https://center.diia.gov.ua/	Diia Center	0	1	0	0	1	1	1	0	0	0	4	4	4	4	0	0
34.	https://city.diia.gov.ua/	Diia City	1	0	0	1	1	1	0	0	0	1	5	5	5	4	0	1

#	Reference	Name	C1	C2	C3	C4	C5	C6	C7	C8	C9	C10	BA 2024	BA 2023	BA 2022	BA 2021	Progress / year	Progress / 2 years
35.	https://e.land.gov.ua/services	Web resource of electronic services of the State GeoCadastre	0	1	1	1	1	1	1	0	0	1	7	6	7	7	1	0
36.	https://cabinet.tax.gov.ua/	Electronic Cabinet of the taxpayer of the State Tax Service	1	1	0	0	1	1	1	0	0	0	5	5	8	6	0	-1
37.	https://asvpweb.minjust.gov.ua/#/search-debtors	Search for enforcement proceedings	0	0	1	1	1	0	1	1	1	0	6	5	3	N	1	-
38.	https://portal.pfu.gov.ua/sidebar/Templates/Default	E-services portal of the Pension Fund of Ukraine	0	0	1	1	1	0	1	0	0	0	4	4	4	4	0	0
39.	https://rezerv.gov.ua/	State Reserve Agency of Ukraine	1	0	1	1	1	1	1	0	0	0	6	6	5	N	0	-
40.	https://policy.mtsbu.ua/	Checking the validity of the CMTPL insurance policy	0	1	1	1	1	0	0	1	0	1	6	6	6	N	0	-
41.	https://corruptinfo.nazk.gov.ua/	Unified state register of persons who have committed corruption or corruption-related offenses	1	0	0	1	0	1	0	0	0	1	4	4	5	8	0	-4
42.	https://legalaid.gov.ua/	Free legal aid	0	1	1	1	1	1	1	0	1	0	7	8	8	N	-1	-
43.	https://fiu.gov.ua	State financial monitoring	1	0	1	1	1	1	0	0	0	0	5	5	7	N	0	-
44.	https://e-services.davr.gov.ua	Portal of electronic services, State Agency of Water Resources of Ukraine	1	0	1	1	1	1	1	0	1	1	8	8	8	8	0	0
45.	https://e-services.msp.gov.ua/	Appointment of assistance at childbirth	0	1	0	1	1	1	1	1	1	0	7	7	7	7	0	0
46.	https://wanted.mvs.gov.ua/passport/	Checking the passport in the database of stolen or lost items	1	1	1	0	1	0	1	0	0	1	6	7	7	N	-1	-
47.	https://dmsu.gov.ua/services/online.html	Online registration in the electronic queue	0	0	0	0	1	1	0	0	0	0	2	3	3	3	-1	-1
48.	https://bf.diia.gov.ua/	Diia.Barrier-Free Environment	1	1	1	1	1	1	1	1	1	1	10	10	10	N	0	-
49.	https://www.spfu.gov.ua/	State Property Fund of Ukraine	0	1	0	0	0	1	0	0	0	1	3	4	3	3	-1	0

#	Reference	Name	C1	C2	C3	C4	C5	C6	C7	C8	C9	C10	BA 2024	BA 2023	BA 2022	BA 2021	Progress / year	Progress / 2 years
50.	https://dpsu.gov.ua/ua/map	Interactive map of checkpoints / Entry-exit checkpoints	0	1	0	1	0	0	1	0	1	1	5	3	2	4	2	1
51.	https://lms.e-school.net.ua/	All-Ukrainian school online	0	1	1	1	1	1	0	1	1	1	8	8	8	N	0	-
52.	https://registry.edbo.gov.ua/	Register of educational entities	1	1	1	1	1	1	1	0	0	0	7	7	8	3	0	4
53.	https://e-services.dsns.gov.ua/	Portal of electronic services	0	1	0	1	1	1	1	0	0	1	6	7	7	7	-1	-1
54.	https://nszu.gov.ua/	National Health Service of Ukraine of Ukraine	0	1	0	0	1	0	1	0	0	0	3	3	N	N	0	-
55.	https://spending.gov.ua/login	Single web portal for the use of public funds	0	0	0	1	1	0	1	0	0	1	4	4	3	3	0	1
56.	https://acskidd.gov.ua/manage-certificates	Repeated (remote) formation of certificates by electronic request	0	0	0	1	0	1	0	0	0	1	3	4	4	3	-1	0
57.	https://czo.gov.ua/verify	Online service for verification of qualified electronic signature or seal for electronic documents	1	1	1	1	1	1	1	0	0	1	8	8	6	5	0	3
58.	https://nads.gov.ua/	National Agency of Ukraine on Civil Service	0	1	0	1	1	0	0	0	0	1	4	4	N	N	0	-
59.	https://info.edbo.gov.ua/edu-documents/	Register of documents on education	0	1	1	1	1	1	1	0	0	0	6	6	6	4	0	2
60.	https://dsns.gov.ua/	State Emergency Service	1	1	0	1	1	1	0	0	0	1	6	6	5	N	0	-
61.	https://id.court.gov.ua/	Electronic Court	1	1	1	1	1	0	1	1	1	1	9	8	8	7	1	2
62.	https://online.minjust.gov.ua/dokumenty/choise	Online House of Justice	1	1	0	1	1	1	1	0	0	1	7	3	3	3	4	4
63.	https://wanted.mvs.gov.ua/searchtransport/	Vehicles on a wanted list	1	1	1	0	1	0	1	0	0	1	6	7	7	6	-1	0
64.	https://petition.president.gov.ua/	Electronic petitions, representation of the President of Ukraine	0	1	0	0	1	0	1	0	0	1	4	4	4	4	0	0

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

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

#	Reference	Name	C1	C2	C3	C4	C5	C6	C7	C8	C9	C10	BA 2024	BA 2023	BA 2022	BA 2021	Progress / year	Progress / 2 years
96.	https://khoda.gov.ua/	Kherson Regional State Administration	0	0	0	0	1	1	0	0	0	1	3	3	3	3	0	0
97.	http://www.adm.km.ua/	Khmelnytskyi Regional State Administration	0	0	0	0	1	1	1	0	1	0	4	3	4	4	1	0
98.	https://ck-oda.gov.ua/	Cherkasy Regional State Administration	0	0	0	1	1	1	1	0	0	0	4	4	4	4	0	0
99.	https://bukoda.gov.ua/	Chernivtsi Regional State Administration	0	1	0	0	1	0	0	0	0	1	3	3	3	3	0	0
100.	https://grants.vzaemo.diia.gov.ua	Electronic tender space	0	1	0	0	1	0	1	0	0	1	4	4	4	4	0	0
Total achieved (in points)			39	62	39	69	85	60	52	18	33	59						
Total achieved (in percentage)			39%	62%	39%	69%	85%	60%	52%	18%	33%	59%						

Appendix 2.
Basic accessibility monitoring methodology

General provisions

This methodology defines:

- main criteria of the indicator for monitoring the level of basic accessibility of websites of government authorities for users with visual, hearing, musculoskeletal, speech and intellectual disabilities, as well as with various combinations of disabilities in accordance with DSTU ISO/IEC 40500:2015 "Information Technology. W3C Web Content Accessibility Guidelines (WCAG) 2.0" (hereinafter referred to as accessibility monitoring);

- values of points used to measure the said criteria;

- a mechanism for assessing the achievement of indicators and their criteria;

- preparation and submission of reports on monitoring results (hereinafter referred to as the monitoring reports).

In the methodology, the terms are used within the meaning given in the Resolution of the Cabinet of Ministers of Ukraine No. 3 dated 04.01.2002 "On the Procedure for Publication of Information on the Internet about Activities of Executive Authorities" and DSTU ISO/IEC 40500:2015 "Information Technologies. W3C Web Content Accessibility Guidelines (WCAG) 2.0".

I. Criteria of accessibility indicator and the amount of measuring points

The list of main criteria of the indicator is set out in *Appendix 1*.

Criteria of accessibility indicator are based on DSTU EN 301 549:2022. Compliance of the criteria of accessibility indicator with the criteria of the WCAG 2.1 standard is defined in *Appendix 1*.

Criteria of accessibility indicator should be understood subject to the following:

Criterion 1. Sufficient text contrast – the contrast ratio of any text on the page relative to the background is at least 4.5:1.

Criterion 2. Availability of alternative text for all images – all images have alternative text provided using the alt attribute. If one or several images do not have the alt text, **the criterion is considered unachieved**.

Criterion 3. Availability of accessible text for all hyperlinks – hyperlinks have visible text or, if an icon or an image is used instead of visible text, a hidden text label is provided that is accessible to screen readers. If one or several hyperlinks do not have accessible text, **the criterion is considered unachieved**.

Criterion 4. Availability of text labels for all buttons – buttons have visible text or, if an icon or an image is used instead of visible text, a text label accessible to screen readers is provided. If one or several buttons do not have a text label, **the criterion is considered unachieved**.

Criterion 5. Availability of text labels for form fields – each field has a text label, that describes its purpose and does not disappear after entering information. If one or several fields do not have text labels or the text label disappears after entering information in that field, **the criterion is considered unachieved**.

Criterion 6. Software definition of main language of the page – main language of the page is specified using the lang attribute. If the lang attribute is missing or its value does not correspond to language in which the page content is presented, **the criterion is considered unachieved**.

Criterion 7. Lack of errors in the page code – the page code complies with the specification of HTML and other languages that are used, such as WAI ARIA. If the page contains more than one element with the same value of the id attribute or violates the WAI ARIA markup rules, **the criterion is considered unachieved**.

Criterion 8. Providing a mechanism to quickly navigate to main content of the page – if a menu or other secondary content is placed before main content of the page, then the header of the website should contain a link that takes to the beginning of main content of the page.

Criterion 9. Marking the keyboard focus – when navigating using the keyboard, the position of the keyboard focus can be determined visually. If when navigating using the keyboard, the marking of one or more elements is missing, **the criterion is considered unachieved**.

Criterion 10. Keyboard control support – all hyperlinks, buttons, input fields, and other elements that can be focused using the mouse, can also receive focus using the keyboard. If one or several elements that can receive focus using the mouse do not receive focus using the keyboard, **the criterion is considered unachieved**.

II. Assessment data

The assessment of the indicator and its criteria is based on the data obtained as a result of visual inspection of the website pages and analysis of the website code using special tools designed to check accessibility.

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

III. Assessment of the achievement of the basic accessibility indicator and its criteria

Assessment of the achievement of the indicator criteria by the measurement unit "1/0"

If, according to the assessment data, the indicator criterion:

1) **is achieved** – the measurement unit of the indicator criterion is set to "1".
In this case, the score is equal to 1 point;

2) **is not achieved** – the measurement unit of the indicator criterion is set to "0".
In this case, the score is equal to 0 points.

Assessment of achievement of the basic accessibility indicator by the measurement unit "0-10"

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

Determining the level of basic accessibility

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

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

IV. Procedure for compiling and submitting monitoring reports

The monitoring report form is defined in Appendix 2. This form consists of 3 sections.

In section 1 "General information":

- line "Indicator name" indicates the name of the indicator "Basic accessibility";
- lines "Reporting period from" and "Reporting period to" indicate the start and end dates of the reporting period in the format dd.mm.yyyy respectively. The start date of the current reporting period is the date following the end of the previous reporting period;
- column "Data source" indicates the software that was used to collect data.

In Section 2 "Websites, indicator criteria and their scores":

- column "Website" indicates the website address (for example: kmu.gov.ua);
- column "1", "2", ..., "10" indicates relevant score of the criterion from 1 to 10 for this website (0 or 1);
- column "Basic accessibility" indicates the value of indicator "Basic accessibility" of this website (from 0 to 10).

Section 3 "List of unachieved indicator criteria and recommendations for elimination of reasons for non-achievement" indicates the indicator criteria that were not achieved, as well as recommended actions aimed at elimination of reasons for this.

Annex A to the Methodology
Criteria of basic accessibility indicator

Criterion	WCAG success criterion
1. Sufficient text contrast	1.4.3
2. Availability of alternative text for all images	1.1.1
3. Availability of accessible text for all hyperlinks	4.1.2
4. Availability of text labels for all buttons	4.1.2
5. Availability of text labels for form fields	4.1.2
6. Software definition of main language of the page	3.1.1
7. Lack of errors in the page code	4.1.1
8. Providing a mechanism to quickly navigate to main content of the page	2.4.1
9. Marking the keyboard focus	2.4.7
10. Keyboard control support	2.1.1

Appendix B to the Methodology
Example of the monitoring report form

I. General information

Name of the indicator	Basic accessibility
Reporting period from	
Reporting period to	
Data source	(software used for data collection)

II. Websites, indicator criteria and their scores

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

III. List of unachieved indicator criteria and recommendations for elimination of reasons for non-achievement

_____ (code and name of the criterion)

Number of websites that did not achieve this criterion: __%

Recommendations for elimination of reasons for non-achievement of the criteria: _____