DIGITÁLNÍ
A INFORMAČNÍ
AGENTURA_

Report of the Czech Republic on the outcome of the monitoring of the accessibility of the websites and mobile applications of public sector bodies

Monitoring period: 2022-2024

National authority responsible for monitoring: Digital and Information Agency

Contact email: pristupnost@dia.gov.cz

Document Title: Report of the Czech Republic on the outcome of monitoring the accessibility of websites and mobile applications

This document has been produced **by the Digital and Information Agency**, which is responsible for monitoring in accordance with Article 9 of Directive (EU) 2016/2102 of the European Parliament and of the Council of 26 October 2016 on the accessibility of the websites and mobile application of public sector bodies. This Article lays down requirements for systematic monitoring of web accessibility, including an obligation for Member States to ensure regular assessment of the compliance of public sector websites and mobile applications with prescribed accessibility standards.

The aim of the document is to provide a detailed overview of the monitoring activities conducted and their results during the reporting period. It includes information on the monitoring period, the identification of the responsible authorities, the methodologies used, and details on the representativeness and distribution of the sample. It also includes key findings from the testing conducted, and recommendations for improvements to contribute to a higher level of accessibility of digital services in line with the objectives of the Directive. This approach ensures transparency in the monitoring process and supports further steps to meet legislative requirements.

DIGITÁLNÍ A INFORMAČNÍ AGENTURA
NA VÁPENCE 915/14, 130 00 PRAHA 3
POSTA@DIA.GOV.CZ

Content

1. Summary of the report 1
2. Description of monitoring activities 2
   2.1. General information 2
      2.1.1. Data in which monitoring took place within the reference period 2
      2.1.2. Identification of the authority responsible for monitoring 3
      2.1.3. Description of the representativeness and distribution of the sample 3
   2.2. Sample composition 12
      2.2.1. Total number of websites and mobile applications included in the sample 12
      2.2.2. Number of websites evaluated using the simplified monitoring method and number of websites and mobile applications assessed using the in-depth monitoring method 13
      2.2.3. Number of monitored websites and mobile applications by administrative hierarchy levels 15
3. Correlation with standards, technical specifications, and monitoring tools 15
   3.1. Overview of the accessibility monitoring methods 17
      3.1.1. In-depth monitoring that verifies all process steps based on standard sequences, including interaction with forms and error messages. 17
      3.1.2. Simplified monitoring, which includes automated tests focusing on perceivability, operability, intelligibility, and stability 19
   3.2. Details of the tools and tests used 20
4. Monitoring results 22
   4.1. Detailed monitoring results 22
      4.1.1. Results for websites and mobile apps 22
      4.1.2. Quantitative analysis of monitoring results 24
5. Use of the enforcement procedure and feedback from end users 29
   5.1. Description of the use of the enforcement procedure 29
   5.2. Feedback from end users 30
      5.2.1. Obtaining feedback from users with regard to the accessibility of digital services 30
6. Content on additional measures 30
   6.1. The additional measure required by the Article 8 (5) of the Directive (EU) 2016/2102. 31
7. Awareness-raising and Educational Activities Focusing on Web Accessibility 32
8. Conclusion 33
9. List of Figures 35
10. List of Tables 35

1. Summary of the report

This report focuses on monitoring the accessibility of websites and mobile applications by Czech Republic in compliance with the Directive (EU) 2016/2102 and national legislation. The monitoring process is divided into two main categories: website monitoring and mobile applications monitoring, each following specific procedures and methodologies.

Monitoring includes three basic types of evaluation and testing:

1. **Simplified monitoring:** These checks focus on fast and efficient verification of essential aspects of web accessibility using automated tools and simple manual procedures. The aim is to get a broad overview of the state of accessibility on a larger sample of evaluated websites or mobile applications.
2. **In-depth monitoring**: These checks are more detailed accessibility assessments, including a detailed analysis of technical and user aspects. These checks require manual testing, simulation of scenarios of users with disabilities, and the use of assistive technologies. They are performed on a smaller sample but provide a deeper insight into the overall level of compliance with the web accessibility requirements.
3. **Mobile applications monitoring:** This type of check is tailored to the specifics of mobile applications, such as assessing the app's touch gesture control, proper use of semantic elements, and compatibility with different operating systems and devices.

All types of monitoring are documented in accordance with a uniform methodology that ensures consistency of results and allows data to be compared between evaluations. The outputs of the testing serve not only as a basis for evaluation reports, but also as a tool for planning improvement measures. This process contributes to meeting legislative requirements and increasing the level of digital inclusion at national and the European level.

The web accessibility monitoring took place during the reporting period in 2022, 2023 and 2024. In these years, a number of inspections of websites and mobile applications have been carried out to verify their compliance with the legislative requirements of Directive (EU) 2016/2102 and the Czech Act No. 99/2019 Coll. The inspections included both simplified and in-depth analyses of the accessibility of websites and mobile applications.

During the reporting period, there was a significant change in the organisation responsible for the monitoring the accessibility of websites and mobile applications. While until 31 March 2023, a section of the Ministry of the Interior was entrusted with this agenda, since 1 April 2023, this responsibility was transferred to the Digital and Information Agency (DIA). This transition was part of a change in the legal framework, when the Act No. 99/2019 Coll., on the accessibility of websites and mobile applications, was amended to reflect this change in the governance.

To ensure compliance, we applied a distributed sample when selecting the sample for 2022, 2023 and 2024, which considers representativeness and geographical balance, covering websites and mobile applications from different levels of the government (national, regional, local) and public entities. This report provides a comprehensive overview of the monitoring of website and mobile application accessibility in the Czech Republic. The results of the inspections are key to planning improvement measures and increasing the level of digital inclusion at national and European level. The transfer of responsibility to the Digital and Information Agency (DIA) has contributed to better coordination and efficiency in the field of accessibility monitoring.

2. Description of monitoring activities

2.1. General information

Monitoring the accessibility of websites and mobile applications is a key activity carried out in accordance with the requirements of Directive (EU) 2016/2102 and national legislation. The process is designed to allow for systematic evaluation of compliance with accessibility criteria and the identification of areas that require improvement. The monitoring takes place at two levels: website monitoring and mobile applications monitoring, with each category having specific procedures and methodologies to match their technical characteristics.

The monitoring process includes three basic types of inspections:

- Simplified monitoring: These checks are aimed at verifying essential aspects of accessibility that can be assessed quickly and efficiently using automated tools and simple manual procedures. The aim is to get a broad overview of the state of accessibility on a larger sample of evaluated websites or mobile applications.
- In-depth monitoring: These are more detailed accessibility assessments, including a detailed analysis of technical and user aspects. These checks require manual testing, simulation of scenarios of users with disabilities, and the use of assistive technologies. They are performed on a smaller sample but provide a deeper insight into the overall level of compliance with the requirements.
- Mobile applications controls: This type of check is tailored to the specifics of mobile apps, such as testing the app's touch gesture control, proper use of semantic elements, and compatibility with different operating systems and devices.

All types of inspections are documented in compliance with a uniform methodology that ensures consistency of results and allows data to be compared between evaluations. The outputs of these inspections serve not only as a basis for evaluation reports, but also as a tool for planning improvement measures. This process contributes to meeting legislative requirements and increasing the level of digital inclusion at national and the European level.

2.1.1. Data in which monitoring took place within the reference period

The accessibility monitoring took place during the reporting period in 2022, 2023 and 2024. In these years, a number of inspections of websites and mobile applications have been conducted to verify their compliance with the legislative requirements of the Directive (EU) 2016/2102 and the Czech Act No. 99/2019 Coll., on the accessibility of websites and mobile applications. These inspections included both simplified and in-depth analyses of the accessibility of websites and mobile applications.

The data includes diverse types of assessments, such as automated reviews, manual testing, simulation of scenarios of users with disabilities, and verification of specific aspects of mobile app accessibility. The results of the inspections are the basis for the creation of methodological documents, the preparation of evaluation reports and the planning of further improvement measures.

During the reporting years 2022, 2023 and 2024, a large number of websites and mobile applications were analysed, identifying a number of areas for improvement. The analyses and

results obtained are now used as a basis for further steps in improving the accessibility and inclusion of digital services.

2.1.2. Identification of the authority responsible for monitoring

During the reporting period, there was a notable change in the organisation responsible for monitoring the accessibility of websites and mobile applications. Until 31 March 2023, a section of the Ministry of the Interior was entrusted with this agenda, but as of 1 April 2023, this responsibility was transferred to the Digital and Information Agency (DIA). This transition was part of a change in the legal framework, when the Act No. 99/2019 Coll., on the accessibility of websites and mobile applications, was amended to reflect this change.

The change in the legal framework has led to the adaptation of procedures and methodologies related to accessibility monitoring, with the Digital and Information Agency taking responsibility for planning and implementing accessibility checks, creating methodological documents, and preparing outputs for evaluation reports. This was to improve coordination and efficiency in the field of accessibility monitoring and to ensure that the agenda is managed by a specialised office dedicated to digitalisation of public administration. The transfer of responsibilities was gradual and involved the transfer of related competences and resources, which allowed continuity and efficiency to be maintained while meeting the requirements of the Directive (EU) 2016/2102.

2.1.3. Description of the representativeness and distribution of the sample

To ensure compliance with the requirements set out in points 2.2 and 2.3 of Annex I of the Implementing Decision 2018/1524, we applied a spaced sample when sampling for the years 2022, 2023 and 2024. This approach considers:

- Representativeness: The sample includes websites and mobile applications from distinct levels of government (national, regional, local) and public entities, covering a wide range of service providers.
- Geographical balance: Entities from all regions of the Czech Republic were included, while we paid attention to the equal representation of individual regions (NUTS1, NUTS2, NUTS3) and municipalities (LAU1, LAU2).

The methodology of the spaced sample ensured that websites and mobile applications from different areas of public administration were audited every year, allowing for a detailed overview of the level of accessibility across the spectrum of the public sector. This approach ensures a comprehensive and fair assessment of web accessibility as required by the Directive (EU) 2016/2102 and national legislation.

Access to the spaced sample contributes to systematic mapping of accessibility and provides reliable basis for subsequent analyses and evaluations at national and European level.

2.1.3.1. The sample of websites must be representative and geographically balanced, including websites from all levels of government (national, regional, local) and public bodies.

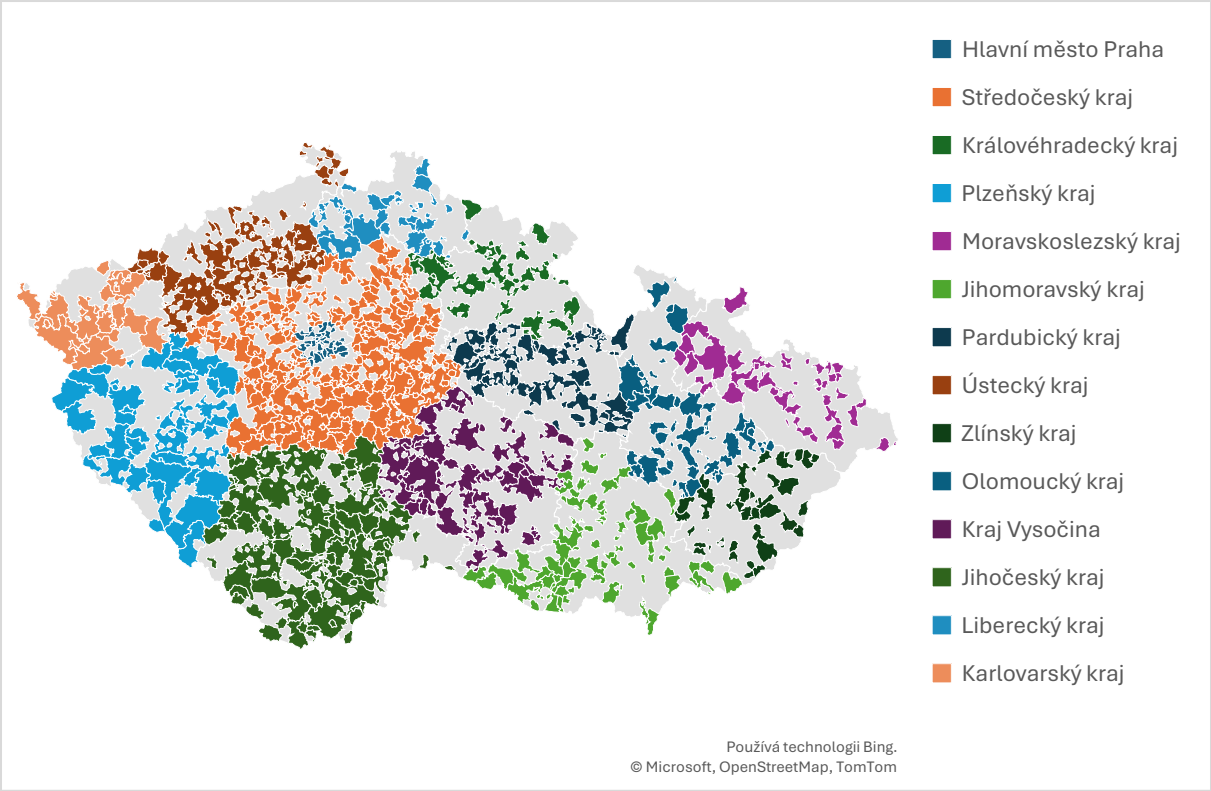

Figure 1 geographical distribution of accessibility checks in the Czech Republic for the period 2022 to 2024

This map shows the geographical distribution of accessibility checks in the Czech Republic for the period 2022 to 2024. Its aim is to show the even geographical coverage of the web accessibility monitoring in selected municipalities, towns and townships, thus illustrating how the evaluations were evenly distributed throughout the Czech Republic.

The map shows the individual regions, municipalities and towns where the monitoring was carried out, and visualises their geographical distribution. With the help of various graphic elements, such as colours or symbols, it is possible to easily identify areas that have been inspected more frequently and, conversely, areas with lower inspection intensity.

The map is used to evaluate the uniform geographical coverage of accessibility checks and provides an overview of their distribution between 2022 and 2024. It helps to identify any regional differences and supports effective planning and future web accessibility monitoring. .

YEAR 2022

Geographical balance

As part of the prescribed website accessibility checks for 2022, the sample was compiled according to the requirement for representativeness and geographical balance. A total of **360 inspections** were carried out, with the sample including:

- **30 national websites** representing the central level of state administration and public entities.
- **13 regional websites**, covering administrative levels NUTS1 to NUTS3, thus ensuring coverage of the regional and interregional levels of administration.

- **317 local websites**, corresponding to the administrative units LAU1 and LAU2, i.e. municipalities and cities, which represents the broadest segment of public administration.

Website Categories	Number of websites checked	Share of the total (%)
Nationwide website	30	8,80%
Regional websites (NUTS1-3)	13	3,80%
Local website (LAU1, LAU2)	317	87,40%
Overall	360	100%

Table 1 thematic focus of the website sample

The table shows the thematic focus of a sample of websites, with local websites being dominant, reflecting their importance in public administration.

Levels of administration

In 2022, website accessibility checks were carried out, divided into individual thematic areas. A total of 360 website checks were carried out, which were classified into the following categories:

Domain	Number of websites checked	Share of the total (%)
Transport	3	0,83%
Recreation and culture	1	0,28%
Social protection	9	2,50%
Public order and security	3	0,83%
Education	34	9,44%
Employment and Taxes	2	0,56%
Public health	7	1,94%
Other	301	83,61%
Total	360	100,00%

Table 2 Administrative level categories

The table shows the number of websites checked for each thematic area and their share in the total sample. The dominant share (83.61%) was comprised of websites in the "Other" category, which corresponds to their frequency among monitored entities.

YEAR 2023

Geographical balance

As part of the prescribed website accessibility monitoring for 2023, the sample was compiled according to the requirement for representativeness and geographical balance. A total of 470 inspections were conducted, with the sample including:

- **41 national websites** representing the central level of state administration and public entities.
- **10 regional websites**, covering administrative levels NUTS1 to NUTS3, thus ensuring coverage of the regional and interregional levels of administration.
- **419 local websites**, corresponding to the administrative units LAU1 and LAU2, i.e. municipalities and cities, which represents the widest segment of public administration.

Website Categories	Number of websites checked	Share of the total (%)
Nationwide website	**41**	**8,72%**
Regional websites (NUTS1, NUTS2, NUTS3)	**10**	**2,13%**
Local website (LAU1, LAU2)	**419**	**89,15%**
Total	**470**	**100%**

Table 3 thematic focus of the website sample

The table shows the thematic focus of a sample of websites, with local websites being dominant, reflecting their importance in public administration. Compared to 2022, there was an increase in the number of checks of local websites by more than 100 cases. The overall number of inspections also increased, indicating a stronger focus on systematic evaluation of web accessibility.

Levels of administration

In 2024, website accessibility checks were conducted, divided into thematic areas. A total of 470 website checks were conducted, which were classified into the following categories:

The table below shows the thematic focus of the sample of websites by main categories:

Domain	Number of websites checked	Share of the total (%)
Housing and public infrastructure	1	0,21%
Other...	362	77,02%
Transport	4	0,85%

Environmental protection	6	1,28%
Recreation and culture	5	1,06%
Social protection	8	1,70%
Public order and security	2	0,43%
Education	76	16,17%
Public health	6	1,28%
Employment and Taxes	0	0,00%
Total	**470**	**100%**

Table 4 Administrative level categories

With 77.02% of all evaluated websites, the **Other** category represents the dominant percentage of all controls. This category includes websites of municipalities, regions, cities, townships and other administrative units. The high proportion of representations reflects the crucial role of local governments in public administration and their direct impact on citizens. Monitoring of this area is crucial, in particular for ensuring local availability of public services and service accessibility.

The second most frequent category is **Education**, which includes 16.17% of all inspections. The importance of this area lies in the responsibility of educational institutions to make information available to the public, including students, parents and educators.

Other public domains, such as **transport, environmental protection, recreation and culture, social protection** or **health**, have smaller shares, but their monitoring remains important due to their specific accessibility requirements and ensuring equality of access.

The total number of 470 website inspections confirms the consistent compliance with legislative requirements and methodologies that ensure representative coverage of various public domains, levels of public administration and their services.

YEAR 2024

Geographical balance

As part of the prescribed website accessibility checks for 2024, the sample was compiled according to the requirement for representativeness and geographical balance. A total of 487 checks were conducted, with the sample including:

- **32 national websites** that represent the central level of state administration and public entities.
- **15 regional websites**, covering administrative levels NUTS1 to NUTS3, thus ensuring coverage of the regional and interregional levels of administration.
- **440 local websites**, corresponding to the administrative units LAU1 and LAU2, i.e. municipalities and cities, which represents the widest segment of public administration.

Website Categories	Number of websites checked	Share of the total
Nationwide website	32	6,57%
Regional websites (NUTS1-3)	15	3,08%
Local website (LAU1, LAU2)	440	90,35%
On the whole	487	100%

Table 5 thematic focus of the website sample

The table shows the thematic focus of a sample of websites, with local websites again being the most prominent. Compared to previous years, the trend of increasing checks of local websites continues, which reflects their importance in terms of accessibility. The total number of inspections carried out in 2024 reached a new high.

Levels of administration

As part of the 2024 website accessibility checks, the websites were divided by thematic categories, which ensures representative coverage of different domains of public administration and services. The total number of websites checked reached **487**, with the categories including the following numbers:

Category	Number of websites	Share of the total
Housing and public infrastructure	0	0,00%
Other...	364	74,75%
Transport	3	0,62%
Environmental protection	1	0,21%
Recreation and culture	10	2,05%
Social protection	14	2,87%
Public order and security	6	1,23%
Education	79	16,22%
Employment and Taxes	0	0,00%
Public health	10	2,05%
Total	487	100%

Table 6 Administrative level categories

The largest share is made up of the category **Other...** (74.75%), which includes municipalities, regions, cities, townships and other administrative units. This area is crucial because it represents the largest part of the public administration, which is closest to citizens and plays a vital role in the provision of public services. Monitoring the accessibility of these websites is therefore particularly important, as it directly affects a large part of the population and contributes to ensuring equal access to information. The **Education category** is the second largest area with 16.22%, reflecting the high importance of educational institutions and their obligation to make information accessible to the general public.

2.1.3.2. When selecting a sample of mobile applications, attention is paid to diverse and representative layout, including frequently downloaded applications for different operating systems.

Mobile Applications Monitoring in 2022

In 2022, inspections of mobile applications were conducted to ensure their accessibility and compliance with legislative requirements. The selection of applications was diverse, representative, and included applications used across a wide range of users, including applications for different operating systems (Android and iOS).

Mobile applications selected for web accessibility evaluation:

1. **V OBRAZE:** The application provides citizens with quick access to information from municipal websites. Users rate the app positively for its simplicity and clarity.
2. **Moje VZP:** An application of the General Health Insurance Company of the Czech Republic provides an overview of payments made and health care received. It is constantly being improved based on user feedback.
3. **Smart Migration:** Helps foreigners in the Czech Republic with their integration, rights & obligations and available services. It is very useful for newcomers.
4. **Česká Obec:** An application to improve communication between citizens and municipal management. It is especially popular in smaller towns.
5. **PID Lítačka:** A mobile application that is used to buy public transport tickets and provide information about public transport in and around the Prague City and the Central Bohemian Region. In 2022, some requests to improve accessibility for people with visual impairments appeared.
6. **Moje Kunratice:** An application focused on communication between citizens and the Prague-Kunratice district. Users can report problems, access to information is simple and clear.

Grain applications	Number of apps evaluated	Share of the total
V OBRAZE	5	26,32%
My VZP	1	5,26%
Smart Migration	1	5,26%
MUNIPOLIS/Mobile Radio	5	26,32%
Czech municipality	3	15,79%
The Capital City of Prague (Prague Integrated Transport)	1	5,26%
Prague-Kunratice City District - application from drualas.cz	1	5,26%
Total	**19**	**100%**

Table 7 Mobile applications selected for accessibility testing

Two applications, "PID Lítačka" and "Moje VZP", require user login to access some functionalities. For this reason, accessibility testing was limited to publicly available information only.

The checks included verifying the apps' compliance with accessibility rules, including keyboard navigation, voice control and ensuring sufficient contrast. The apps have been evaluated for their usability for users with different abilities. The selection of applications for review in 2022 reflected the diversity of user needs and the variety of uses. The findings of the inspections will serve as a basis for improving the accessibility of mobile applications in the public sector.

Mobile Applications Monitoring in 2023

In 2023, mobile app accessibility checks were conducted, which included verifying the apps' compliance with accessibility rules. The checks focused on keyboard navigation, voice control, sufficient contrast, and overall usability for users with different abilities. The selection of applications reflected the different areas of public administration and local government, with the aim of providing equal access to public services for all citizens, including those with disabilities.

These evaluations will contribute to improving the accessibility of mobile applications within the public sector in the future, feeding into recommendations for app developers as well as national and local authorities.

Description of mobile applications:

1. **In the picture** – A mobile application aimed at providing access to essential information about public services and events in the city. The app is designed for citizens who want to be informed about what is happening in their region and offers various features to improve communication with local authorities.
2. **Říčany on Your Mobile** – A mobile application for the town of Říčany, which provides citizens with access to information about local events, news and official matters. It allows citizens to submit requests and feedback to city authorities.
3. **Czech municipality** – An application aimed at providing access to information about municipalities in the Czech Republic. It allows users to search for information about municipalities, their authorities and public services.
4. **MUNIPOLIS** – An application for city and municipal governments that is used to ensure fast and effective communication between citizens and authorities. It offers options for submitting applications, tracking the status of requests, and securing public announcements.
5. **CZSO (Czech Statistical Office)** – An application of the Czech Statistical Office that provides access to public statistics, data and research in various areas. It allows users to easily access information about demographics, the economy, and other key areas.
6. **Semily** – A mobile application for the town of Semily, which allows citizens to access information about city events, news and official matters. It also includes features for applying and interacting with the city office.
7. **Prague 12 on Your Mobile** – An application for the city district of Prague 12, which allows citizens to access information about local events, cultural events and services offered by the city district.

8. **MUNIPOLIS/Mobile Radio** – An application used for communication between public administration and citizens. It allows users to receive important notifications and information from their municipality or borough.
9. **Smart Migration** – The mobile application allows users to easily find answers to common problems they solve during their stay in the Czech Republic.

Mobile Applications	Number of apps evaluated	Share of the total (%)
IN THE PICTURE	7	36,84%
Říčany on your mobile	1	5,26%
Czech municipality	1	5,26%
MUNIPOLIS	3	15,79%
CZSO	1	5,26%
Semily	1	5,26%
Prague 12 on your mobile	1	5,26%
MUNIPOLIS/Mobile Radio	1	5,26%
Smart Migration	1	5,26%
Total	**19**	**100%**

Table 8 Mobile applications selected for accessibility evaluation

Mobile Applications Monitoring in 2024

In 2024, accessibility checks were carried out on mobile applications that are part of public services and intended for the general public. A total of 19 inspections of mobile applications were carried out, which were classified into the following categories:

- **My Prague** – an application providing information about city services and events in the capital.
- **V OBRAZE /In the picture** – a series of applications aimed at improving accessibility and providing information to the general public, including specific user needs.
- **Munipolis** – a mobile application for administration and communication with public services, which offers a wide range of functions for municipalities and city administrators.

The checks focused on verifying the compliance of the apps with accessibility requirements, which included an analysis of the interface, navigation and accessibility for people with specific needs. Most apps have been tested for compatibility with accessibility tools for users with disabilities.

Mobile Applications	Number of inspections	Share of the total
My Prague	1	5,26%
IN THE PICTURE	16	84,21%
Munipolis	2	10,53%
Total	**19**	**100%**

Table 9 Mobile applications selected for accessibility testing

Mobile applications monitoring in 2024 included verifying that selected apps comply with accessibility rules, including keyboard navigation, voice control, ensuring sufficient contrast and accessibility for different user groups. The apps were evaluated for their usability for users with different abilities, which included tests for people with visual or motor impairments. The selection of mobile applications for the evaluation in 2024 reflected the diversity of the public sector and a wide range of user needs. The findings of these inspections will serve as a basis for improving the accessibility of mobile applications of public administrations and will support efforts to ensure equal access to information and services for all users.

2.2. Sample composition

When determining the number of websites and mobile applications to be audited for 2022, 2023 and 2024, the procedure was in line with the requirements of the EU Directive 2016/2102, which aims to ensure the accessibility of public sector websites and mobile applications. In accordance with the Directive, samples were selected to be representative and to ensure a balanced geographical and thematic coverage, covering different levels of government (national, regional, local).

The selection of audited items has been carefully designed to cover the widest possible range of public services and institutions, including cities, municipalities, and statutory cities. Given these criteria, different categories of services were included, such as transport, health, education, social protection and others. The selection of apps was also designed with a diversity of user needs in mind, ensuring that the checks cover both websites and mobile applications that are commonly used by citizens.

2.2.1. Total number of websites and mobile applications included in the sample

Year	Number of websites monitored	Number of mobile apps monitored	Total
2022	341	19	360
2023	451	19	470
2024	468	19	487

Table 10 Number of audited items in 2022, 2023 and 2024

2.2.2. Number of websites evaluated using the simplified monitoring method and number of websites and mobile applications assessed using the in-depth monitoring method

Between 2022 and 2024, two methodologies were used for website monitoring, the in-depth and simplified monitoring. The simplified monitoring applies only to **websites. The mobile applications are being evaluated solely by the in-depth monitoring approach,** as more detailed accessibility analysis is needed. The testing here is conducted with respect to apps' specific functionality and technical requirements, which cannot be effectively evaluated by simplified monitoring.

Simplified monitoring was used for a larger number of websites, with an emphasis on essential accessibility aspects such as correct labelling, content structure and compatibility with assistive technologies. In contrast, the in-depth monitoring method was applied to a smaller sample of websites and included a more detailed analysis that focused on complex aspects of accessibility, including testing with different assistive technologies, navigation, and visual accessibility.

This approach has ensured that a wide range of websites have been covered, with a method chosen for mobile applications that guarantees a detailed evaluation and compliance with applicable regulations.

Websites monitoring:

Year 2022:

- **In-depth monitoring**: 26 websites were surveyed, providing a detailed analysis of the site, with an emphasis on accessibility and compliance with regulatory requirements.
- **Simplified monitoring:** This approach was applied to 315 websites, allowing for wider of accessibility monitoring, but with a lower level of detail.
- **Total:** 341 websites were evaluated in 2022.

Year 2023:

- **In-depth monitoring**: Conducted on 30 websites.
- **Simplified monitoring:** This type of monitoring was applied to 421 websites.
- **Total:** 451 websites were reviewed in 2023.

Year 2024:

- **In-depth monitoring**: 31 websites were evaluated using the in-depth monitoring methodology.
- **Simplified monitoring:** Used for 437 websites.
- **Total:** 468 public sector bodies' websites were evaluated in 2024.

Year	Number of websites checked using the in-depth monitoring method	Number of websites evaluated using the simplified monitoring approach	Total
2022	26	315	341
2023	30	421	451
2024	31	437	468

Table 11 Overview of the number of websites selected for accessibility testing

In the 2022-2024 period, two evaluation methodologies were used in website checks: in-depth and simplified monitoring. The in-depth monitoring method focused on a detailed analysis of accessibility and compliance with applicable legislation, applying it to a smaller sample of sites. The simplified method was used for a wider sample of webpages, where the emphasis was placed on basic accessibility criteria, thus allowing effective coverage of a larger number of pages.

In all three years, these methodologies have been combined to achieve a balanced coverage of all domains and levels of the government and distinct types of public institutions. This is in line with the requirements of the EU Directive 2016/2102 and other relevant national and EU legislation.

This combination of methods provided a comprehensive view of the state of website accessibility in 2022, 2023 and 2024 and served as a basis for further recommendations and improvements in this area.

Mobile Applications:

Mobile applications were evaluated exclusively by the method of in-depth monitoring **between 2022 and 2024**. This approach is specific to mobile applications, as they require a more detailed analysis of their functionality, interaction with user devices and assistive technologies. The use of in-depth monitoring method ensures that the accessibility of mobile applications is evaluated comprehensively and thoroughly, to ensure that public services are as inclusive as possible for the users with different needs.

Year	Number of mobile apps being monitored
2022	19
2023	19
2024	19

Table 12 Number of mobile applications monitored

2.2.3. Number of monitored websites and mobile applications by administrative hierarchy levels

Mobile Applications

Year	Nationwide mobile app	Regional mobile applications (NUTS1, NUTS2, NUTS3)	Local mobile app (LAU1, LAU2)	Total
2022	2	1	16	19
2023	1	0	18	19
2024	0	1	18	19

Table 13 Number of monitored mobile applications by administrative hierarchy levels

Websites:

Year	Nationwide website	Regional websites (NUTS1, NUTS2, NUTS3)	Local website (LAU1, LAU2)	Total
2022	28	12	301	341
2023	40	10	401	451
2024	32	14	422	468

Table 14 Number of monitored websites from each category by level of administration

3. Correlation with standards, technical specifications, and monitoring tools

Tool/Method	Purpose	Automated or Manual Testing	Tests performed	Usability tests included
Accessibility Insights	Detailed evaluation of accessibility for websites and applications.	Automated and manual	ARIA role, HTML structure, keyboard navigation, compatibility with screen readers.	Yes, Manual checks for detailed evaluation.
Axe	Automated testing of HTML code and ARIA attributes.	Automated	Contrast problems, missing labels, accessibility of controls.	No, usability tests directly, but it helps in navigation testing.

WAVE	Visualize feedback for accessibility issues on websites.	Automated	Missing alt text, problems with HTML structure, errors in contrast.	No, usability tests directly.
Lighthouse	Complete website audit including performance, SEO and accessibility.	Automated	Comprehensive accessibility audit, including performance issues.	No, it does not directly cover usability tests, but it does cover key approaches.
Window Resizer	Testing responsive design and accessibility on different devices.	Automated	Verification of layout and accessibility on different screen sizes.	No, usability tests directly.
Color Contrast Analyzer	Verifying the contrast of text and background to meet WCAG standards.	Automated	Contrast ratio control.	No, usability tests directly.
axe PDF Checker	Testing the accessibility of PDF documents.	Automated	Verify navigability, text readability, and compatibility with screen readers.	No, usability tests directly.
NVDA (Screen Reader)	Screen reader compatibility testing.	Manual	Verification of correct marking, alt texts and keyboard navigation.	Yes, key usability tests for screen reader users.
Navigating using only the keyboard	Provide accessibility for users who cannot use a mouse.	Manual	Verification of keyboard navigation, focus management, access to interactive elements.	Yes, tests for users with motor problems.
Contrast Testing (Manual)	Visualizations or tools to check sufficient contrast.	Manual	Subjective or tool-based evaluation of contrast for readability.	Yes, ensuring accessibility for visually impaired users.
Test form interactions	Verification of accessibility and	Manual	Validate form labels, organize	Yes, key usability tests for

	usability of forms.		fields, and report errors.	clarity and ease of use.
Multimedia testing	Ensuring the accessibility of multimedia content (audio, video).	Manual	Testing subtitles, transcripts, and device compatibility.	Yes, key usability tests for users with hearing problems.

Table 15 Overview of accessibility tracking methods

3.1. Overview of the accessibility monitoring methods

In the process of web accessibility monitoring, the Digital and Information Agency applies monitoring methods that complement each other and reflect the requirements set out in the standards and technical specifications referred to in Article 6 of the Directive (EU) 2016/2102. These methods are independent of specific tests, tools, operating systems and browsers, which ensures their wider applicability.

In-depth monitoring

As a part of in-depth monitoring, the DIA provides detailed verification of the compliance of websites and mobile applications with the requirements specified in the standards. The in-depth monitoring includes:

Detailed analysis: Monitoring requires a detailed assessment of user interaction with the forms and controls, including user's input confirmations and error messages.

Usability Tests: In addition to technical criteria, the DIA often includes user tests that examine how people with disabilities use websites and apps. These tests help identify areas that could be problematic for users, which is key to ensuring an inclusive approach.

Simplified monitoring

For websites that show non-compliance, DIA applies simplified monitoring methods:

To test the compliance with accessibility requirements:

This method includes automated tests that identify areas of non-compliance, especially in the areas of perceptibility and controllability. Simplified monitoring also assesses the specific needs of different user groups, including of the blind and visually impaired users.

To update test rules regularly:

After each monitoring cycle, the testing rules are regularly revised to reflect changes in standards and requirements, ensuring that the monitoring is always up-to-date and relevant.

3.1.1. In-depth monitoring that verifies all process steps based on standard sequences, including interaction with forms and error messages.

In-depth monitoring of the accessibility of websites and mobile applications is a complex process that focuses on all aspects of user interaction with digital content. Each step of the verification is performed according to standard sequences, which includes not only visual inspection, but also testing of functionality, such as working with forms and their error messages. The aim is to ensure

that all elements are accessible and understandable for a wide range of users, including people with disabilities.

During this process, automated and manual testing methods are combined. Automated tools are used to quickly identify the most common issues, such as missing labels or incorrect code structure. However, manual testing is crucial for detecting problems that the software does not catch. For example, this check emphasizes keyboard browsing of web pages, which helps to verify accessibility for users who cannot use a mouse. At the same time, the developer console is used to check the correctness of the code and structure of the pages.

Special attention is paid to the images, not only their presence, but also the quality of the captions. Each image is evaluated to see if its alt text matches its content and context. We also check attached documents, such as PDFs and Word files, to make sure they meet accessibility criteria, such as reading correctly with screen readers or using semantically correct styles. In this way, we ensure that accessibility is addressed holistically, and the monitoring results provide an accurate picture of the actual accessibility status of the tested content.

In-depth monitoring of website and mobile application accessibility involves a combination of automated and manual methods to ensure maximum accessibility for all users, including people with disabilities. This process focuses on several key areas of control:

Disabling CSS styles: Disabling CSS styles tests the web page without visual editing. This ensures that the content is still readable and uncluttered. It is checked that all elements such as texts, links and images are legible and accessible without graphic enhancements. This step is important to verify that the page is accessible to users with a low resolution or screen reader.

Image Checker: Each image on the page is checked for correctness of alt text. This text must accurately describe the content and purpose of the image, which is key for visually impaired users who use screen readers. It also verifies that the images are contrasting enough against the background to be clear to all users.

Document accessibility evaluation: Attached documents (PDF, Word) are tested to ensure that they meet accessibility standards. This verifies that the document is understandable by screen readers, that its headings, table labels, and lists are set correctly, and that the text is labelled correctly. It also tests whether the documents are readable by users with limited vision or without a mouse.

Evaluation of electronic forms and their interaction with the keyboard: Forms are tested to see how keyboard-only forms are operating, which is crucial for users who can't use a mouse. In addition, it is checked whether the error messages are displayed correctly and whether all form elements (text fields, buttons, check boxes) are accessible and correctly labelled.

Manual checks: The manual check tests the navigation of the page using the keyboard, which makes it possible to verify that all interactive elements (e.g. links, buttons) are reachable without using the mouse. Tests are also performed to verify that error messages and information are communicated correctly, for example when submitting a form or navigating between sections.

Automated accessibility testing tools: Automated tools like Lighthouse or Axe quickly analyze a page's code and identify common issues such as missing alt text for images, incomplete title structures, or incorrect code semantics. These tools provide a quick overview of accessibility and show areas that may require more detailed manual testing

Heading Checks: Each webpage is evaluated to ensure that their structure and usage of headings is properly implemented for usability and accessibility. The proper headings not only help with page orientation, but also allow to use screen readers effectively. It also ensures that the headings match the content and align with the hierarchy.

Contrast Check: Testing whether text has enough contrast against the background to make it readable by all users, especially those with visual impairments. The contrast between text and background should meet the minimum recommended values set by accessibility standards (e.g., WCAG).

Language setting testing Verifies that the language of the page is set correctly in the code, allowing screen readers and other assistive technologies to interpret the content correctly. A correct language setting is important to ensure that the text is pronounced correctly and to ensure that the translation tools work properly.

In this way, an in-depth monitoring of all aspects of accessibility is carried out, ensuring that websites and mobile applications meet accessibility requirements and are usable by the widest possible range of users.

3.1.2. Simplified monitoring, which includes automated tests focusing on perceivability, operability, intelligibility, and stability

Simplified accessibility tracking is a quick process that uses automated tools to verify the essential aspects of web page perceivability, operability, comprehensibility, and stability. This process involves several steps that are aimed at identifying the most common accessibility issues.

Automated accessibility tests: We use tools like Lighthouse to run quick code tests and identify issues such as missing alt texts for images or incorrect headline structure. These tools also evaluate the contrast of text against the background and other accessibility criteria.

Heading check: Even with simplified testing, we check that the headings are properly structured and hierarchized. This includes verifying that the H1, H2, etc. headings are used correctly, allowing for better page navigation.

Navigating a page with an immersive reader: While the process is simplified, we verify how screen readers read the content of the page. The test is important for users who cannot consume visual information because readers provide feedback on page layout, headings, and descriptions.

Link and form checking: Automated tools check the basic functionality of links and forms, including verifying that all interactive elements are accessible and that they provide the correct error messages. The process also verifies that the forms work correctly without a mouse, only with a keyboard.

Stability and Clarity: Testing includes checking the stability and clarity of the page. This means verifying that the page is displayed correctly in all browsers and that interactive elements such as forms or buttons are sufficiently clear and functional.

This simplified review process provides a quick overview of accessibility, but still includes key verification steps to ensure that the website is accessible to the public, including users with different needs.

3.2. Details of the tools and tests used

As part of the accessibility monitoring in 2022, 2023 and 2024, various tools were used to carry out accessibility checks on websites and mobile applications. The main tools included both automated testing tools and manual assessments, which enabled a comprehensive accessibility analysis.

Automated tools:

Tools such as Accessibility Insights**,** axe **and** WAVE **were used for simplified checks**, which allow quick verification of basic accessibility criteria such as contrast, HTML structure, correct use of ARIA attributes and mouse less navigation. These tools provide outputs that make it easier to identify commonly encountered accessibility issues in websites and applications. In addition, the following tools were used for a more detailed and comprehensive evaluation of web accessibility:

- **Accessibility Insights**: This tool is designed to evaluate the accessibility of websites and applications in detail. It is designed to allow accessibility issues to be quickly identified, especially those that may be overlooked during routine inspection. **Accessibility Insights** enables automated tests that focus on key accessibility areas, such as the correct use of ARIA roles, HTML structure, keyboard navigation, and screen reader compatibility. In addition, the tool also offers manual checklists that make it easy to thoroughly verify each error detected.
- **axe**: The **axe tool** is widely used for automated accessibility testing and is known for its accuracy in detecting problems with HTML code and ARIA attributes. **AXE** is integrated into browser development tools and provides detailed reports to help quickly identify accessibility errors on websites. This tool detects issues with contrast, text captions, operability, and other aspects of accessibility.
- **WAVE (Web Accessibility Evaluation Tool): WAVE** is a tool that provides visual feedback on accessibility issues directly on the site. It makes it easy to identify problem areas such as missing alt texts for images, incorrect HTML structuring, or insufficient contrast between text and background. WAVE displays errors on the page and provides links to specific parts of WCAG, making it easier to fix and improve accessibility.
- **Lighthouse**: The Lighthouse is a tool provided by Google that conducts a comprehensive website audit. In addition to evaluating accessibility, it also focuses on performance, SEO, and other areas that can affect the quality of a website. Lighthouse provides detailed reports on accessibility issues and makes it possible to test websites in different configurations, which is important for verifying compatibility with different devices and browsers.
- **Window Resizer**: This tool is useful for responsive design testing, that is, checking that a website responds correctly to changes in window size to ensure accessibility on various devices such as mobile phones, tablets, and desktops. It helps verify that users can access content and features, regardless of screen size.
- **Colour Contrast Analyzer**: This tool is used to verify that the contrast between text and background on webpages meets the minimum requirements set by WCAG. **The Colour Contrast Analyzer** is key to ensuring that the content is easy to read even for users with visual impairments, including color blindness.

For **in-depth monitoring** and control of the accessibility of PDF documents, the **axe PDF checker** (https://check.axes4.com/en/) tool was used to identify and correct accessibility issues in PDF files. This tool analyses PDF documents and detects problems with text readability, keyboard navigation,

correctness of document structure, and other aspects that may affect accessibility for people with disabilities.

These tools provide a wide range of options for performing both simplified and in-depth accessibility checks. Using a combination of these tools allows for efficient and comprehensive testing of websites, mobile apps, and PDF documents, ensuring that digital content is accessible to all users, including those with disabilities.

Manual accessibility testing:

This testing is a necessary complement to automated tools, as some aspects of accessibility cannot be fully captured by automated tests. Manual testing focuses on details that require interaction with a website or application from the user's perspective and includes usability tests that require human feedback.

The main manual tests include:

Testing with screen readers:

Testing with screen readers that convert text to spoken language or Braille is key to ensuring proper accessibility for users with visual impairments. Some of the most commonly used screen readers are **NVDA** (NonVisual Desktop Access) and **JAWS** (Job Access With Speech).

- **NVDA** is a free screen reader that allows users with disabilities to read web page content through speech synthesis or Braille. Testing with NVDA includes verifying that all interactive elements (such as buttons, links, forms) are readable, correctly labelled (for example, using ARIA roles), and that it is possible to navigate the page using keyboard shortcuts.
- **Testing with NVDA includes**:
    - Verify that alt text is correct for images and graphics.
    - Ensure that the status of interactive elements such as checkboxes, buttons, and form fields is correctly announced.
    - Verify that keyboard shortcuts allow navigation and interaction with content (e.g., using the Tab key to navigate between elements).

Keyboard testing:

Keyboard-only accessibility testing is a key step in ensuring that users who cannot use a mouse (e.g., those with motor or coordination issues) can interact effectively with a website or mobile app.

- **Testing includes**:
    - Verify that all interactive elements (links, buttons, forms) are accessible by using keyboard shortcuts (for example, by using Tab, Shift+Tab, Enter, Space).
    - Verify that you ensure the correct order of consecutive interactive elements so that you can navigate the page meaningfully.
    - Testing whether the "focus" on the active element is set correctly (for example, when entering data into a form).

Contrast testing:

While automated tools like **Colour Contrast Analyzer** can detect underlying contrast issues, manual testing also involves verifying that background text is readable enough for all users, including those with vision issues. Manual contrast testing can use a contrast measurement tool, but it can also be a subjective assessment of the quality of the background text, such as checking whether the text is not on a similarly coloured background or whether it is accessible in different lighting conditions.

To test interaction with forms:

To verify that the forms are accessible to users with different types of disabilities (especially those with visual and cognitive disabilities), it is necessary to carry out tests aimed at:

- Verify that **form labels are set correctly**, which allow screen readers to correctly identify the functionality and meaning of form fields.
- Verify that the form is properly organized and read for users who use a keyboard or screen reader.
- Testing that all fields are labelled correctly and that the user is receiving the correct instructions (for example, when entering the wrong format in a text box).

Usability testing:

Usability tests involve working with people with disabilities to test interaction with specific elements on websites or apps. This testing method provides valuable feedback from real users who have various forms of disability, such as those with visual or hearing impairments, or those with muscle problems. For usability testing, we mainly work with visually impaired people who help us perform the following tasks:

- Verify that all interactive elements are easy to navigate with the keyboard.
- Testing navigation and filling in forms by people with disabilities.
- Verification that all information is easy to understand, even for users with cognitive or language barriers.

This close cooperation makes it possible to obtain thorough and relevant information on the actual applicability for people with disabilities.

4. Monitoring results

4.1. Detailed monitoring results

4.1.1. Results for websites and mobile apps

WCAG Criterion	Year 2022	Year 2023	Year 2024	Total for the monitored period:
WCAG 1.4.3	194	260	261	**715**
WCAG 4.1.2	97	272	304	**673**

WCAG 1.3.1	174	186	226	**586**
WCAG 2.4.4	156	228	197	**581**
WCAG 1.1.1	66	125	89	**280**
WCAG 1.4.4	4	53	46	**103**
WCAG 1.4.1	0	41	46	**87**
WCAG 3.1.1	23	28	26	**77**
WCAG 2.4.1	69	8	0	**77**
WCAG 2.4.7	6	17	0	**23**
WCAG 1.4.5	0	0	11	**11**
WCAG 1.4.10	3	5	2	**10**
WCAG 1.4.2	0	3	0	**3**
WCAG 2.1.1	0	0	3	**3**
WCAG 1.3.5	1	1	1	**3**
WCAG 3.1.2	0	2	0	**2**
WCAG 3.2.1	1	0	0	**1**
WCAG 3.3.1	0	1	0	**1**
WCAG 2.2.2	0	0	1	**1**
WCAG 2.2.1	0	1	0	**1**
WCAG 1.4.12	0	0	1	**1**

Table 16 Number of non-conformities and accessibility issues by the WCAG criteria

This table shows the number of non-conformities or issues detected by each WCAG 2.1 (Web Content Accessibility Guidelines) criterion in 2022, 2023, and 2024, along with the total number of these issues for monitoring periods.

Each WCAG criterion represents specific requirements for ensuring the accessibility of websites and digital services. The numbers in the table show how many non-compliances with the Web Content Accessibility Guidelines were identified during the audit.

Areas with the highest incidence of errors:

WCAG 1.4.3 (Text Contrast)

shows 194 non-compliances in 2022, 260 in 2023 and 261 non-compliances in 2024.

This criterion focuses on sufficient contrast between the text and its background, which ensures readability for users with visual difficulties. The most widespread issue was the lack of colour differentiation of the background text, especially for buttons and headings. In many cases, colours were chosen regardless of the recommended contrast ratio of 4.5:1 for plain text and 3:1

for large text. Another frequent problem was the use of texts placed on gradient or image backgrounds, where the contrast was not sufficient in some parts.

WCAG 4.1.2 (Interactive Component Accessibility)

has 97 non-conformities in 2022, 272 in 2023 and 304 in 2024.

This requirement ensures that interactive elements such as buttons, links, and form fields are clearly defined and operable for assistive technologies. The most common errors were missing labels (aria-label or title attributes), inaccessible formatting of buttons or fields, or insufficient marking of element status (e.g. whether the checkbox is checked). Issues with tabs that did not allow users to navigate using the keyboard were also identified.

WCAG 1.1.1 (Textual Descriptions of Image Elements)

In 2022, we recorded 66 errors, 125 in 2023 and 89 in 2024.

That criterion requires that all figurative elements that do not serve a purely decorative purpose have appropriate alternative text. The absence of alternative texts for icons, diagrams and banners was most often found. In some cases, the text was present, but its content was not sufficiently descriptive, for example, the key data was not described in the graphs or the purpose of the buttons containing images was not explained. There were also issues with inconsistent use of alt attributes or omitting them where necessary.

The table shows the trend in identified accessibility issues and provides an overview of how the issues have evolved over the years, which can help identify areas that need more attention and fixing. When sending the results of the accessibility check, we provide obliged entities not only with an overview of the identified deficiencies, but also with specific recommendations aimed at remedying them. These recommendations are based on an accessibility evaluation and an analysis of the areas where errors are most common. Even in cases where the inspection does not detect any violations, we include preventive advice that reflects the most common problems found during inspections by other entities, such as insufficient text contrast, missing labels for interactive elements or incorrect use of alternative text. In this way, we want to help obliged entities not only to immediately address any deficiencies, but also to improve accessibility in the long term and prevent problems that occur most often in practice.

4.1.2. Quantitative analysis of monitoring results

4.1.2.1. Findings on frequent or serious cases of non-compliance with accessibility requirements.

Overall assessment of the number of non-compliances

The overview shows the number of non-compliance issues with each WCAG criterion in each year, with the total number for three years being the sum of the values for each year. Overall, some criteria show a stable or increasing number of problems, which may indicate that certain areas of accessibility are not sufficiently addressed.

Identifying the criteria with the most accessibility issues

WCAG 1.4.3 (Text and Background Contrast): This standard was violated 715 times, which represents the highest occurrence of accessibility issues identified by monitoring. This problem is likely to be common because it is a basic requirement to ensure readability for users with vision problems. It may indicate that public entities are still ignoring the need for sufficient contrast between text and background.

WCAG 4.1.2 (As forms and controls must be fully accessible): This issue has occurred 673 times, indicating frequent issues with interactive elements that are not implemented correctly for all users, including those who use a reader or keyboard instead of a mouse.

WCAG 1.3.1 (Content Semantics): This issue has occurred 586 times, which may indicate issues with the layout and structure of content on pages, making it difficult for users with special needs to navigate.

Problems that show a significant decrease

WCAG 2.4.1 (Focusable Cursor): This issue has completely almost disappeared in 2023 and 2024, which is a positive trend. In 2022, the error was recorded 69 times, but in subsequent years the problem decreased significantly, which may indicate improvements in interactive elements and accessibility.

WCAG 2.4.7 (Visible Focus Indication): This issue had 17 instances in 2023 but none in 2024, which may mean that it was resolved as part of the website design update.

Criteria with very few non-conformities identified

WCAG 1.4.5 (More than one way to navigate): This issue was only seen in 2024 (11 cases), suggesting that the problem was not as common in previous years.

WCAG 1.4.12 (Images as text): This issue has only been reported once in 2024, indicating that it is rather rare.

Serious and frequent accessibility issues

WCAG 1.4.3 and WCAG 4.1.2: Form contrast and accessibility issues are probably the most pressing because they can directly affect the ability of users with disabilities to use websites.

WCAG 1.3.1: Semantic content organization issues can negatively affect users with reading devices.

Recommendations for improving accessibility:

Improved text and background contrast, which is key for users with vision problems. Improving the accessibility of interactive elements, especially forms and controls, which has a major impact on users with various forms of disabilities. Review content semantics to ensure that content is properly structured for users with special needs. Attention to detail in the form of images, texts, and navigation elements that still show mismatches, but to a lesser extent.

The analysis of this data shows that, although there have been some improvements over the years, there are still areas where major improvements need to be made, especially in the area of contrast and accessibility of interactive elements. The implementation of the recommended

changes should lead to a significant improvement in overall accessibility for people with disabilities.

In the inspection documents we send, which are part of our accessibility investigations, we include not only the findings themselves, but also specific recommendations. These recommendations highlight the most common accessibility errors we identified during the review and provide direction for correcting them. In this way, we want to help obliged entities improve the accessibility of their digital services and ensure that they fully meet the needs of all users.

4.1.2.2. Development of accessibility of monitored websites or mobile applications between individual monitored periods.

The table provides an overview of the number of errors identified by the categories of websites and mobile apps between 2022 and 2024, focusing on the severity of these errors. The severity is divided into eight categories, with category "0" indicating entities without errors and category "8" indicating entities with the most serious errors.

Bugs in this category:	Year 2022	Year 2023	Year 2024
0	50	31	56
1	79	92	96
2	77	110	107
3	66	98	99
4	52	70	58
5	23	47	50
6	12	18	16
7	1	4	4
8	0	0	1
Overall:	360	470	487

Table 17 Development of errors in categories compared to 2022-2024

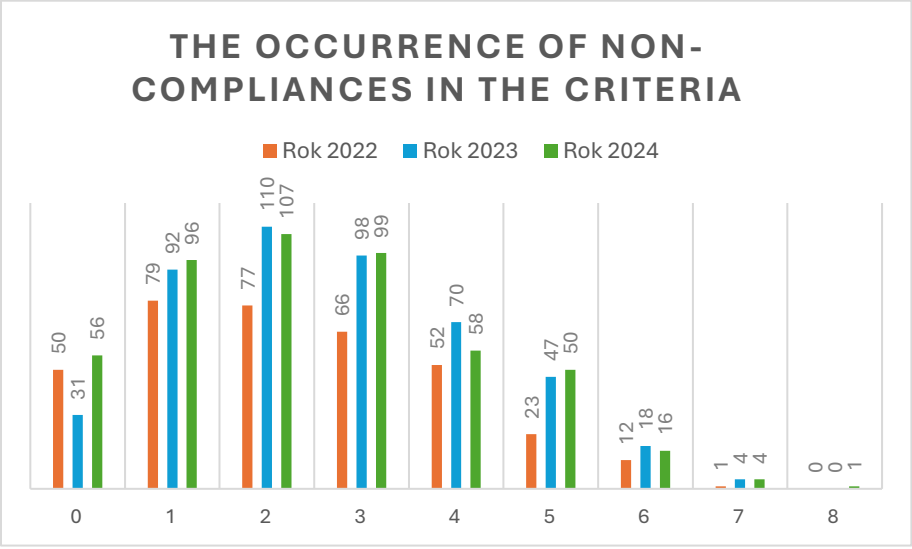

Figure 2 The occurrence of non-compliances in the criteria for accessibility

For 2022, 2023 and 2024, we recorded several non-compliances in the web accessibility criteria when carrying out the accessibility evaluation. A total of 310 errors were recorded in 2022, with the most issues occurring in the categories with one (79) and two (77) errors. In 2023, we registered 395 errors, with the highest number of errors found in the categories with one (92) and two (110) errors. A total of 431 errors were recorded in 2024, with problems persisting this year, especially in the categories with one (96) and two (107) errors.

From this data, the largest number of errors are found in categories that have only one or two errors, indicating the fact that some websites or applications are still experiencing minor but frequent problems. This trend is also evident in 2024, where, as in previous years, there are many entities with a minimum number of errors.

Compliance with the Accessibility Statement

Consistency in the Accessibility Statement:	2022	2023	2024
No	266	395	210
Yes	93	74	276
Not rated	1	1	1

Table 18 Compliance with the accessibility statement for 2022, 2023 and 2024

Based on the data on compliance with the accessibility statement for the years 2022, 2023 and 2024, the following conclusions can be drawn:

Year 2022:

In 2022, only 25.8% of entities met the accessibility requirements according to the accessibility statement. The high proportion (73.9%) of entities that did not comply indicates significant problems with the implementation of accessibility and the need for immediate action to remedy it. This year can be seen as an accessibility challenge, where problems had to be identified and addressed in many areas.

Year 2023:

In 2023, there was a further deterioration with only 15.7% of subjects meeting the accessibility conditions. This decrease may signal increasing compliance issues, which may be related to the lack of implementation of new rules or to an increase in the complexity of accessibility requirements. This trend points to the need for stronger access to education and support to ensure accessibility for all users.

Year 2024:

The year 2024 brought a significant improvement, with 56.6% of entities meeting accessibility requirements. These positive developments suggest that public sector bodies have started to implement accessibility measures more effectively and have become more responsive to the

issues identified in previous years. This trend is promising and suggests that accessibility standards are starting to be taken more seriously.

Key factors of the evaluation:

The improvement in 2024 is noticeable and points to a positive trend in accessibility performance. This progress should be encouraged, especially in areas that still show weaknesses.

Challenges in 2023:

The significant increase in the number of entities that do not comply with accessibility standards in 2023 indicates that there was a need to focus more attention on prevention and early detection of accessibility issues.

Identified shortcomings and areas for improvement:

Even though compliance with the accessibility statement has improved in 2024, there are still more than 40% of entities that have deficiencies. This suggests that there are still areas for further improvement in 2025, especially in education and the application of automation and accessibility control tools.

Compliance with the accessibility statement in 2024 shows a significant improvement compared to previous years. Although the trend is positive, sustained efforts are still needed in the areas of education, implementation of testing and monitoring tools to achieve full accessibility for all users. Continuing to develop these measures will be key to further improving accessibility performance in the future.

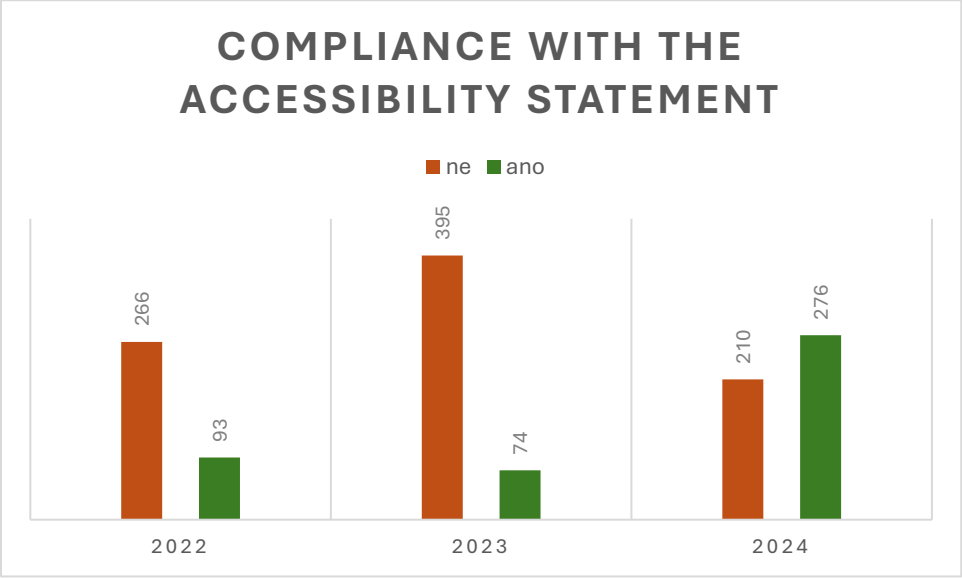

Figure 3 Number of checks for each year (2022, 2023, 2024) by compliance with the accessibility statement

The graph shows the number of web accessibility audits divided by years (2022, 2023, 2024) and compliance with the accessibility statement.

- **No**: Checks that do not meet the requirements of the accessibility statement.

- **Yes**: Checks that are consistent with the declaration.

5. Use of the enforcement procedure and feedback from end users

5.1. Description of the use of the enforcement procedure

Enforcement of legislation on the accessibility of digital services

In the Czech Republic, the monitoring of the accessibility of websites and mobile applications is entrusted to the Digital and Information Agency (DIA). This public Administration body took over the audit agenda from the Ministry of the Interior in April 2023 and has since acted as a key entity responsible for enforcing compliance in this area. The DIA carries out its inspections on the basis of the Act No. 255/2012 Coll., on Inspection (Inspection Code), and the Act No. 99/2019 Coll., on the accessibility of websites and mobile applications.

Act No. 99/2019 Coll. – Ensuring the accessibility of websites and mobile applications

Act No. 99/2019 Coll., which regulates the accessibility of websites and mobile applications of obliged entities, is based on the European Directive 2016/2102, which introduces the obligation of European Union member states to ensure that state websites and applications are accessible to all users, including persons with disabilities. This legal framework emphasises:

Developing sanctions: If a public site or app does not comply with web accessibility requirements, there should be specific sanctions that incentivize authorities to act. The Act No. 99/2019 Coll. provides that fines and other sanctions may be imposed in case of non-compliance with accessibility standards to ensure remedy and prevent recurrence of deficiencies.

Mandate of the law enforcement authority: Act No. 99/2019 Coll. also requires the appointment of a competent authority that will have the power to monitor, investigate complaints and, if necessary, conduct independent investigations regarding the lack of accessibility of websites and mobile applications. This body is responsible for ensuring that public authorities comply with the accessibility requirements laid down by the law.

Effective enforcement: This body must have the power to conduct independent investigations, issue instructions and ensure that public administrations comply with accessibility standards. In practice, this means that the Agency is obliged not only to evaluate the compliance with the law, but also to provide an expert advice to help public administrations adapt their digital services to accessibility standards.

The DIA focuses on promoting the accessibility of digital services through systematic checks to ensure that public institutions meet the relevant standards. To do this, it has a team of experts who undergo specialized training covering both the technical and legal aspects of accessibility. These experts are entrusted with the performance of accessibility audits, and their work also includes provision of methodological guidance and recommendations for remediation.

The web accessibility monitoring in practice

The DIA proceeds with web accessibility audits in several stages, each of which is thoroughly documented. This approach ensures transparency and makes it possible to monitor the effectiveness of the measures taken. The web accessibility monitoring process includes:

Preparation and commencement of accessibility audit: Before the audit , a record of the tasks preceding the audit is made. This document is used to record the preparatory steps and to identify the areas on which the inspection will focus.

Conducting an inspection: The DIA focuses on determining the compliance of digital services with web accessibility standards. The inspections include technical testing of websites or mobile applications and assessing whether the services are usable for people with disabilities.

Documentation of results: The results of each inspection are documented in the protocol that contains a detailed analysis of the identified non-compliances, technical issues, and the recommendations for their elimination. This document serves as a basis for further communication with and the support provided to the public administration entity.

A request for corrective actions to address the identified non-compliances: : Based on the findings of the inspection, the public sector body is asked to implement corrective measures towards compliance with the web accessibility standards. . The DIA sets a deadline of six months for the implementation of corrective actions, with the obligation to inform the Agency of the steps taken.

The DIA contributes to better availability of digital government services for various groups of people in the Czech Republic, especially for people with disabilities. This systematic approach aims not only to meet legal obligations, but also to promote long-term inclusion in the public sector. DIA is thus becoming an important link in the field of digitalization, combining technical expertise to create an accessible environment for all.

5.2. Feedback from end users

5.2.1. Obtaining feedback from users with regard to the accessibility of digital services

In the Czech Republic, the mechanism for collecting feedback on the accessibility of digital services such as websites and mobile applications is systematically provided through various communication channels. Users can express their opinions, comments, or suggestions, in particular if they have specific needs, through **an accessibility statement** that is included in every public digital service. This statement includes an e-mail address **pristupnost@dia.gov.cz** to which citizens can send their questions and complaints regarding accessibility.

In addition to the communication via e-mail with DIA, users have the option of communicating via the **data mailbox service**, which is also listed on the website of the Digital and Information Agency (DIA). This method of communication is especially important for people who prefer a formal and secure channel for sending their suggestions for improvement. The data mailbox is fully integrated into the public administration systems, which allows users to communicate effectively with relevant public authorities and share their feedback that can be used to improve the accessibility of digital public services.

The DIA regularly monitors all incoming suggestions, whether sent via e-mail or data mailbox. If accessibility issues are detected, the DIA takes the necessary measures to correct them. This may involve communicating with the responsible public authorities, providing methodological recommendations or initiating further steps to ensure that digital public services fully comply with the web accessibility standards.

This approach ensures that user feedback is regularly collected and used effectively to improve accessibility. In this way, the Czech Republic ensures that digital services are accessible to all citizens, including those who face various restrictions when using these services.

6. Content on additional measures

6.1. The additional measure required by the Article 8 (5) of the Directive (EU) 2016/2102

In the Czech Republic, monitoring of the accessibility of digital public services for public entities is part of the obligations arising from legal regulations, specifically Act **No. 99/2019 Coll.**, **on the accessibility of websites and mobile applications**. This act implements the European Directive (EU) 2016/2102, which sets clear rules to ensure the accessibility of public digital services, both for persons with disabilities and for all users who may have specific needs when using digital tools.

Accessibility check in the Czech Republic

In the Czech Republic**, the Digital and Information Agency (DIA)** is responsible for carrying out accessibility checks on public websites and mobile applications. The checks focus on whether obliged entities comply with the accessibility requirements set by legislation. This means that every public institution, whether they are ministries, authorities or city and regional governments, must ensure that its website and mobile applications are also accessible to people with disabilities, including people with visual, hearing or motor disabilities.

A possibility to apply paragraph 7 of the Act 99/2019 Coll.

If a public entity faces issues that prevent it from meeting the accessibility requirements, it can refer to so-called exceptions under **paragraph 7 of the Act No. 99/2019 Coll**. This section stipulates that if the implementation of accessibility would entail a disproportionate burden (for example, due to excessive costs or technical problems), the entity may apply for an exception. Exceptions may only apply to certain functions or information that are not accessible to persons with disabilities.

Obligation to provide alternative solutions

Even if a public body makes use of the exemption under paragraph 7, this public body has to **put in place an alternative solution** to ensure that persons with disabilities continue to have access to information and functionalities that are not available to them in a digital form. This requirement is part of the EU directive and the Czech legal framework, and the emphasis is placed on ensuring that alternative solutions are as fast, easily accessible and effective as possible.

Alternative ways of accessing information may include:

- A support provided via the telephone **to** enable users to obtain the information they need,
- **Providing information in alternative formats** such as in printed form or on accessible media;
- **Assistance services** that can help people with disabilities navigate the website or use the mobile apps.

If a public institution cannot ensure that accessibility problems are resolved immediately, it must ensure that temporary measures are available until the problem is resolved.

In the Czech Republic, public entities are therefore obliged to ensure the accessibility of their digital services, even if they face problems with compliance with accessibility under the law. Although they can use the exemption under paragraph 7 of the Act 99/2019 Coll., they must always provide alternative solutions that allow all users, including people with disabilities, to

access the necessary information and public service functions. The Digital and Information Agency (DIA) plays a key role in monitoring compliance with these obligations and ensuring that public bodies comply with accessibility requirements.

7. Awareness-raising and Educational Activities Focusing on Web Accessibility

Webinars on web and mobile application accessibility

In 2024, already under the auspices of the DIA and the Government Commissioner for Human Rights, a webinar dedicated to the accessibility of websites and mobile applications took place. The aim of the event was to raise awareness of the technical and legislative aspects of accessibility and to provide practical guidelines on how to improve the accessibility of digital services. More than 700 people from various domains of public administration and the private sector registered for the webinar. Over 400 questions were asked during registration, focusing mainly on technical accessibility requirements, specific recommendations and examples of good practice. The content of the webinar included presentations that highlighted the importance of accessibility for people with disabilities and presented tools and methodologies for evaluating accessibility. The event was evaluated very positively, with participants appreciating specific examples and practical advice on how to improve accessibility.

Digital Services Webinar

Another important webinar was a webinar focused on digital services, which was intended for obliged entities. The program also included a presentation on the topic of accessibility of digital public services. This part of the webinar focused on:

- Legislation and requirements for the accessibility of digital public services.
- Examples of web accessibility implementation.
- Tools and practices to improve web accessibility.

The webinar was met with great interest, and participants welcomed practical tips and information on how to make digital services accessible to a wide range of users.

Collaboration and best practice sharing with the web accessibility team from the Slovakia

In 2024, DIA established close cooperation with the Ministry of Investment, Regional Development and Informatics of the Slovak Republic in the field of accessibility of the websites and mobile applications of public sector bodies.

This collaboration included:

- Exchange of experience in accessibility audits and implementation of legislative requirements.
- Sharing good practice examples of implementing accessibility in digital public services.
- An ongoing discussion on a unified approach to the methodology of accessibility evaluation within the region.

This collaboration has strengthened our knowledge and brought new ideas for improving our accessibility evaluation processes.

Involvement of the DIA in national and European working groups

On the national level, the DIA has become a member of the newly established Working Group for the Accessibility of Digital Services under the Government Council for the Information Society. This working group focuses on coordinating activities in the field of digital accessibility and providing expert recommendations.

The DIA is also a member of the Committee for Persons with Disabilities (RVOZP) for the accessibility of public administration and public services. Within this platform, we participate in regular meetings where the DIA presents the results of the web accessibility monitoring. In these forums, we focus on sharing practical knowledge and findings as well as proposing improvements to the legislative and methodological framework for better accessibility of digital public services in the Czech Republic.

The web accessibility monitoring team at DIA closely cooperates with Mrs Eva Jordán Vaňková from the Permanent Representation of the Czech Republic to the EU to ensure even better alignment of the Czech Republic's approach with the European legislation and standards of accessibility of public services. Representatives of DIA also appreciate collaboration with other Member States, the European Commission, and other stakeholders in the Web Accessibility Directive Expert Group (WADEX).

These engagements significantly contribute to meeting legislative requirements in the field of digital accessibility and to its further development at the national and international level.

8. Conclusion

During the monitoring period of 2022, 2023 and 2024, a large number of websites and mobile applications were analysed, identifying a number of areas for improvement. These analyses and results are now used as a basis for further steps to increase the accessibility and inclusion of digital public services.

During the reporting period, the change in web accessibility governance in the Czech Republic took place. Until 31 March 2023, a section of the Ministry of the Interior was entrusted with this agenda, while as of 1 April 2023, the web accessibility directive monitoring responsibility was transferred to the Digital and Information Agency (DIA). This transition was part of a change in the legal framework, when Act No. 99/2019 Coll., on the accessibility of websites and mobile applications, was amended, which reflects this change.

This change led to the adaptation of procedures and methodologies related to accessibility monitoring, with the Digital and Information Agency taking responsibility for planning and implementing accessibility checks, creating methodological documents, and preparing outputs for evaluation reports. This was aimed at improving coordination and efficiency in accessibility monitoring and ensuring that this agenda is managed by a specialised office dedicated to the digital fields.

The accessibility monitoring process included three basic types of checks: simplified checks, thorough checks, and mobile app checks. The simplified checks focused on verifying the basic aspects of accessibility using automated tools and simple manual procedures. Thorough reviews included a detailed analysis of technical and user aspects, including manual testing and

simulation of scenarios for users with disabilities. Mobile app scans have been tailored to the specifics of mobile apps, such as app control testing and compatibility with different operating systems and devices. Web accessibility monitoring for the reported period is documented in compliance with a uniform methodology that ensures consistency of results and allows data to be compared between years and evaluations. The monitoring findings serve not only as a basis for evaluation reports, but also as a tool for planning improvement measures. This process has contributed to meeting legislative requirements and increasing the level of digital inclusion at the national and European level.

The Digital and Information Agency also organised webinars and training to raise awareness of accessibility, which contributed to a better understanding and implementation of accessible solutions. In addition, we are actively cooperating with the Slovak side to share experience and best practices in the field of digital services accessibility.

Following the conflict in Ukraine and due to increased migration during the reporting period, there has been an increase in the population, which has led to an increase in the number of websites accessibility evaluations planned for 2025. This increase is reflected in the planning of resources and methodologies to ensure effective coverage of all required controls for the next monitoring period.

9. List of Figures

Figure 1 geographical distribution of accessibility checks in the Czech Republic for the period 2022 to 2024 4
Figure 2 The occurrence of non-compliances in the criteria for accessibility 26
Figure 3 Number of checks for each year (2022, 2023, 2024) by compliance with the accessibility statement 28

10. List of Tables

Table 1 thematic focus of the website sample 5
Table 2 Administrative level categories 5
Table 3 thematic focus of the website sample 6
Table 4 Administrative level categories 7
Table 5 thematic focus of the website sample 8
Table 6 Administrative level categories 8
Table 7 Mobile applications selected for accessibility testing 9
Table 8 Mobile applications selected for accessibility evaluation 11
Table 9 Mobile applications selected for accessibility testing 12
Table 10 Number of audited items in 2022, 2023 and 2024 12
Table 11 Overview of the number of websites selected for accessibility testing 14
Table 12 Number of mobile applications monitored 14
Table 13 Number of monitored mobile applications by administrative hierarchy levels 15
Table 14 Number of monitored websites from each category by level of administration 15
Table 15 Overview of accessibility tracking methods 17
Table 16 Number of non-conformities and accessibility issues by the WCAG criteria 23
Table 17 Development of errors in categories compared to 2022-2024 26
Table 18 Compliance with the accessibility statement for 2022, 2023 and 2024 27