

Norway's Monitoring Report for the EU Web Accessibility Directive (WAD) 2024



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EXECUTIVE SUMMARY OF THE REPORT

This report provides a comprehensive overview of Norway's efforts to implement and assess compliance with Directive (EU) 2016/2102 of the European Parliament and of the Council of 26 October 2016 on the accessibility of the websites and mobile applications (apps) of public sector bodies (WAD).

The report describes the measures undertaken and the development of tools and methodologies despite delays in full-scale monitoring activities.

The Authority for Universal Design of ICT oversees the compliance with web accessibility regulations. WAD was implemented in Norway as of February 2022, requiring public sector websites and apps to meet the WCAG 2.1 success criteria to ensure digital inclusivity.

A centralized Web Accessibility Statement (WAS) solution was launched in 2022. This solution enables public sector bodies to create statements, providing valuable compliance data. The solution also compiles structured data about the public sector bodies and their websites and apps in a way that The Authority can use as basis for the sample for monitoring.

Monitoring activities have not yet commenced. However, a pilot for simplified monitoring was successfully conducted from October to November 2024, involving 255 public sector websites.

The overall score for simplified monitoring across the 255 tested websites was 91 points out of 100. Aggregated compliance rate across all published web accessibility statements was 82 % showing a lower score than the automated test results.

Stakeholder engagement remains a priority, with regular dialogue meetings held with user organizations to gather valuable end-user feedback. The Authority provides targeted guidance through webinars and resources to assist both public and private sector bodies in improving accessibility of their ICT solutions.

1 INTRODUCTION

1.1 *About The Authority for Universal Design of ICT*

The Authority for Universal Design of ICT (The Authority) was established on 1 July 2013 and is part of the Norwegian Digitalisation Agency (Digdir). We have monitored compliance with the Norwegian regulations since 1 July 2014.

As an organization, we envision a society without digital barriers and are mandated to enforce section 18 of the Equality and Anti-Discrimination Act.

1.2 *The Norwegian regulations*

Norway has had regulations for the accessibility of websites, apps and self-service machines in place since 1 July 2013. The regulations apply to entities¹ in both the private and the public sector, including organizations. The requirements entered into force 1 July 2014.

The Norwegian regulations consist of the following

- Act relating to equality and a prohibition against discrimination² (Equality and Anti-Discrimination Act)
- Regulation on Universal Design of Information and Communication Technology (ICT) Solutions³ (Regulation on Universal Design of ICT)

The education sector was included in the regulations on 1 January 2018 with the amendment entering into force 1 January 2019.

1.3 *EU's web directive (WAD) in Norway*

Directive (EU) 2016/2102 on the accessibility of the websites and mobile applications of public sector bodies (WAD) was implemented in Norway 1 February 2022 with the amendment entering into force 1 February 2023.

Note that WCAG 2.1 success criteria 1.2.5 was implemented one year later than the other requirements.⁴ This was due to an additional assessment of the economic consequences of introducing requirements for Audio Description, particularly for the municipalities in the local government sector.

1.4 *Comments on the monitoring activities this reporting period*

The Commission Implementing Decision (EU) 2018/1524 sets out the requirements for the number of websites and apps that shall be included in each monitoring period (Annex III).

¹ Note: We use the terms “entity” and “public sector body” interchangeably.

² The Norwegian [Equality and Anti-Discrimination Act](#)

³ The Norwegian [Regulation on Universal Design of ICT](#) (Norwegian)

⁴ [Press release on Audio Description](#) at regjeringen.no (Norwegian)

1.4.1 Monitoring have not yet commenced

Norway has yet to initiate either in-depth or simplified monitoring, with a timeline for implementation remaining uncertain. There are plans to begin regular simplified monitoring in 2025.

Table 1 shows the number of websites and apps in both simplified and in-depth monitoring for each year during the reporting period.

Table 1 The total number of websites and apps in in-depth and simplified monitoring for the reporting period 2023 and 2024

Monitoring period	Type of monitoring	Websites	Apps	Total
2023	In-depth monitoring	0	0	0
	Simplified monitoring	0		0
	From previous samples	0	0	0
Total		0	0	0
2024	In-depth monitoring	0	0	0
	Simplified monitoring (pilot)	255		255
	From previous samples	0	0	0
Total		255	0	255
Total for reporting period		255	0	255

1.4.2 Limited pilot on simplified monitoring

A pilot of a simplified monitoring effort was conducted to test the systems developed for automated simplified monitoring. The pilot, including both crawling and testing, was carried out from October to November 2024.

Note: The following aspects were not included in the scope of the pilot

- consultation of stakeholders on sampling of entities and websites
- the entities access to results and publication of the results on uutilsynet.no

2 DESCRIPTION OF METHODOLOGY AND APPROACH

2.1 Centralized web accessibility statement (WAS) solution

In 2022, The Authority launched a centralized web accessibility statement (WAS) solution. The WAS-solution is mandatory for public sector bodies, and it assures that the WAS is in accordance with WAD article 7.

It is a self-evaluation form designed for public sector bodies to assess the compliance of their websites and apps with the regulations. The form includes links to relevant guidance, documentation, and detailed instructions on conducting testing. This is available on our website, uustatus.no.

2.1.1 Registry of websites and apps in the public sector

The WAS-solution serves as a comprehensive registry of websites and apps, offering not only an organized database, but also a robust and insightful data source.

All testing and other meta data gathered when a WAS is produced is fed into The Authority's data platform where we can use it for reporting, statistics, research, targeted capacity development of relevant stakeholders, and driving automation efforts.

This capability allows us to analyze which administrative levels and sectors demonstrate the weakest compliance, as well as pinpoint specific areas of the WCAG that require improvement. When performing simplified and in-depth monitoring, the data collected through the WAS solution provides a reliable foundation for selecting representative samples from public sector bodies, including their websites and apps.

2.1.2 Automated checks

The Authority uses data from the WAS-solution to check that the public sector bodies have published WAS on their own websites and that the WAS is updated at least once a year. We have developed and implemented an automated monitoring system (crawler robot) that provides The Authority with an ongoing overview of whether public sector bodies have published a valid WAS.

2.2 In-depth monitoring

The methodology for in-depth monitoring will be based on the requirements in WAD article 8 nr. 2 cf. nr. 3 and the Commission implementing decision (EU) 2018/1524 establishing a monitoring methodology and the arrangements for reporting.

2.2.1 Note on in-depth monitoring and the relation to audits

We have carried out audits since 2015, and The Authority plan to conduct the in-depth monitoring, in such a way that it will also be considered an audit by the national regulations.

This is why Norway's in-depth monitoring will include some adaptations and additional steps that are not required under WAD.

The additional steps are mainly

- Notice
- Documentation
- Follow-up on non-compliance
- The use of sanctions and the right to appeal
- Re-testing after the correction of errors
- Closing letter

During audits, The Authority is legally empowered to impose sanctions if a public sector body fails to comply with the requirements outlined in Section 18, cf. Section 36 of the Equality and Anti-Discrimination Act.

Sanctions presupposes that the audits are done in accordance with the Public Administration Act⁵ (PAA). Individual decisions taken by The Authority, such as correction orders and enforcement fines based on findings from audit reports can be rendered invalid if the requirements in PAA are not met.

2.2.2 About the Norwegian Public Administration Act

The Public Administration Act (PAA) establishes the legal framework governing procedures for activities carried out by public sector bodies, including The Authority.

It provides general rules to ensure that all public sector bodies—whether municipal, county, or state—handle cases in a manner that leads to accurate and well-documented decisions.

The Act covers provisions on scope, exceptions, and definitions, as well as rules on jurisdiction, impartiality, and case proceedings. These include obligations such as providing guidance and documentation, ensuring confidentiality, and respecting defined limitations.

⁵ The Norwegian [Public Administration Act](#)

Additionally, the PAA outlines specific procedural requirements for case handling that culminates in individual decisions. This includes, but is not limited to the

- right to advance notice
- duty to ensure balanced and adequate case facts
- access to case documents and the right to be heard
- requirements for the content and grounds
- notice of individual decisions
- appeal and reversal
- effects of procedural errors
- deferred implementation

2.2.3 Planning and internal preparations

We will plan monitoring activities for the upcoming year by considering the types of monitoring required, determining the number of simplified and in-depth monitoring activities, creating a detailed schedule, and assigning responsibilities for each activity.

The plan will be guided by the requirements outlined in the Web Accessibility Directive (WAD) and aligned with the priorities established in The Authority's strategy⁶.

2.2.4 Sampling

The sampling will be carried out in compliance with the requirements in WAD article 8 and Implementing decision (EU) 2018/1524 Article 6 cf. Annex I Chapter 2 and 3.

The sampling method has not yet been formalized but is expected to include the following elements:

- Entities with higher risk and materiality will have an increased likelihood of selection.
- Risk evaluations will leverage data from the WAS solution and results from simplified monitoring.
- Input from relevant stakeholders will be considered.
- Areas of society, websites, apps, and services critical to ensuring users' rights to equal digital participation will be prioritized.
- Websites and apps with larger user bases will have a higher probability of being selected.

2.2.5 Notice

Public sector bodies will be informed of in-depth monitoring by an individual notice. The notice and other documents regarding the in-depth monitoring will be sent digitally via eDelivery. The public sector body will receive the documents in their case management system or inbox in Altinn.

⁶ [The Authority's strategy 2025 -2029](#)

The purpose of the notice is to:

- Inform the public sector body that their website or app will be subject to monitoring.
- Establish a point of contact within the public sector body and request relevant documentation.
- Outline key deadlines, dates, and steps in the monitoring process.
- Share details about the website, app, requirements, pages, and content that will be tested.
- Provide information about The Authority and its role.

2.2.6 Dialogue and documentation

We plan to maintain a dialogue with the public sector body throughout the in-depth monitoring, via meetings and written communication. The main points of contact typically occur during the following stages:

- Receiving the notice.
- Submitting the requested documentation.
- Receiving and providing feedback on the monitoring results.
- Receiving sanctions, if applicable.
- Engaging in communication activities or media interactions.
- Working on correcting identified errors.
- Receiving the closing letter.

In addition to reviewing the WAS, the notice will request the public sector body to submit specific documents and information. This will typically include:

- An overview of important user tasks.
- A list of the most frequently used pages and content.
- Details of known errors and planned improvements not covered in the WAS.

2.2.7 Testing of websites and apps

Most of the WCAG 2.1 success criteria still require manual testing. The testing will be carried out by the Authority, and will rely on a combination of manual, semi-automated, and automated testing. All test results will be registered and documented in Testlab 2-system. The Authority has developed Testlab 2 as our digital solution for testing, documentation and data collation.

In addition to the registration itself, the errors will be documented with a screenshot, if possible.

The Authority's interpretation of WCAG and test rules

The Authority has a legal interpretation and associated test rules for the relevant WCAG 2.1 requirements.

Each test rule is based on

- A documented interpretation of WCAG 2.1 success criteria, level A and AA cf. EN 301 549 version 3.2.1 chapters 9, 10 and 11
- Information about what it takes to comply with a specific success criterion
- A standardized and detailed test procedure
- A template for registering test data
- Pre-defined test results that are generated automatically based on the registered test data

Assessment and collation of results

After the testing is completed, we will collate and group the test results that show compliance and non-compliance with the regulations.

Most of the collation will be done automatically in the Testlab 2.0-system.

Then we will assess the severity of the errors and categorize the information which then provides the basis for the results presented in the report. We plan to document which requirements the errors are a violation of, including a table of the specific test results related to each success criteria.

2.2.8 Access to the results

Test results that are errors (non-compliance) will be presented to the public sector body in a report and on our website uutilsynet.no. The purpose of the presentation of results and the report will be to summarize and document the monitoring. The public sector body will receive

- An overview of the success criteria that are not met
- The errors and the associated grounds for them, including screenshots
- Links to information and general guidance on how to correct the errors
- Information on which pages, functionality and content the testing included
- General information on how and when the in-depth monitoring was conducted
- Information on next steps and deadlines
- An individual decision on the use of sanctions (if relevant)

Preliminary and final results

First, we will send the preliminary results to the public sector body. The public sector body can then familiarize themselves with the information and the grounds for the results. They can refute the factual basis and assessments done, ask questions, give comments and written feedback. This allows for any errors or misunderstandings to be identified and corrected.

The final results will provide the final summary and results of an in-depth monitoring. It will be updated in line with relevant feedback from the public sector body.

2.2.9 Publication of the results

We plan to publish the final results as reports or information on utilsynet.no. Reports from in-depth monitoring and other documents will usually also be public information and available on [elnnsyn](#) – Electronic Public Records.

Note: The Authority is still working on the module for presentation of the results from in depth-monitoring on our website.

2.2.10 Follow-up on non-compliance

In-depth monitoring with results of non-compliance, will be followed up by the Authority, to ensure that the errors found on the website or app are corrected.

Once the final results have been sent, the public sector body will normally have a deadline of eight weeks to correct non-compliance pointed out by the Authority.

The use of sanctions and the right to appeal

Sanctions can be used as a means of ensuring that public sector bodies comply with the regulations. Sanctions are normally used where an in-depth monitoring identifies non-compliance.

The Authority has the legal basis to impose two types of sanctions

- Correction orders
- Enforcement fines (daily fines)

Sanctions follow the rules for individual decisions in chapters 4 and 5 of the PAA. The public sector body can appeal the imposition of correction orders and enforcement fines.

The rules of the appeals procedure are set out in chapter 6 of the PAA. The Ministry of Digitalisation and Public Governance⁷ is the appeals instance.

2.2.11 Re-testing after the correction of errors

As mentioned above the public sector body will be given eight weeks to correct any errors uncovered in the in-depth monitoring. Once the deadline for corrections passes, the Authority will do a re-test of the website or app. The re-test will be limited to checking if the errors documented in the final report are corrected. We will do this to get an objective, updated status after the public sector body has implemented changes.

If errors still occur, we will normally impose an enforcement fine, and the in-depth monitoring will continue with another re-test after 10 working days.

⁷ The Ministry of Digitalisation and Public Governance [webpage](#)

2.2.12 Closing letter

If the re-testing concludes that the errors have been corrected in a manner that meets the requirements, a closing letter will be sent to the public sector body. This letter will end the in-depth monitoring.

2.3 Simplified monitoring

The methodology for simplified monitoring will be based on the requirements in WAD article 8 nr. 2 cf. nr. 3 and the Commission implementing decision (EU) 2018/1524 establishing a monitoring methodology and the arrangements for reporting.

2.3.1 Sampling of public sector bodies and websites

The Norwegian centralized solution for the web accessibility statement (WAS-solution⁸) will be the primary data source for the sampling process.

It gives us access to structured data about the public sector bodies and their websites. It will also allow us to connect metadata about the public sector bodies to ensure that the sample will be diverse, representative and geographically balanced.

The WAS-solution is only open to public sector bodies.

An entity can be enrolled by two main pathways; the first is the invitation by the agency and the second is by requesting access to the solution. The population of public sector bodies in the WAS-solution is continually updated as new entities are added and other entities are opting out.

The sampling methodology start with the grouping of the entities based on three characteristics of the entity. The geographic location, levels of administration and the services the entities provide.

These parameters are operationalized in the following way:

- Geographic location: The county registered derived from the municipality number in the Central Coordinating Register for Legal Entities
- Administration level: Is operationalized by a combination of organizational type⁹ and Classification of Institutional sector¹⁰ see ANNEX IV
- The services provided is operationalized by using the Standard Industrial Classification 2007 (SIC 2007)¹¹

All entities registered in the WAS-solution that have logged in and confirmed to both being a public sector body and having a website, is defined as the population.

The algorithm calculates the proportion of the population represented by each group and determines the number of entities to be sampled for each group given the desired sample size.

⁸ [Web Accessibility Statement \(WAS-solution\)](#)

⁹ [Types of organisations – The Brønnøysund Register Centre](#)

¹⁰ [Classification of Institutional sector - Statistics Norway](#)

¹¹ [Classification of Standard Industrial Classification - Statistics Norway](#)

It selects a random sample of entities that closely mirrors the distribution of groups in the overall population. For each entity the algorithm then will sample a random website (as an entity may have generated WAS for several websites).

2.3.2 Publishing the public sector bodies and websites selected for simplified monitoring

After The Authority has decided which public sector bodies and websites that will be included in the simplified monitoring, we plan to publish this on our website uuutilsynet.no. The publication of the list will take place at a fixed time each year.

We also plan to publish a news article and a press release and combine this with various communication activities, to make the public sector bodies and others aware of the monitoring.

2.3.3 Sampling of success criteria and pages

This section outlines the targeted sampling of success criteria and pages. It was tested against a total of 14 success criteria shown in Table 2, covering all 4 principles in the WCAG-standard and covering 8 functional performance statements (FPS) from the EN 301 549 standard.

The selection of success criteria is primarily constrained by those covered under Qualweb's ACT rules¹², as well as the Authority's assessment of their quality.

Table 2 Success criteria in monitoring

Success criteria	Principle
1.1.1 Non-text Content	Perceivable
1.3.1 Info and Relationships	Perceivable
1.3.5 Identify Input Purpose	Perceivable
1.4.12 Text Spacing	Perceivable
1.4.3 Contrast (Minimum)	Perceivable
1.4.4 Resize Text	Perceivable
2.1.1 Keyboard	Operable
2.1.2 No Keyboard Trap	Operable
2.2.1 Timing Adjustable	Operable
2.4.2 Page Titled	Operable
2.5.3 Label in Name	Operable

¹² [QualWeb ACT-rules](#)

3.1.1 Language of Page	Understandable
3.1.2 Language of Parts	Understandable
4.1.2 Name, Role, Value	Robust

2.3.4 Crawling and testing of the website with Crawlee and QualWeb

In simplified monitoring the crawling and testing is fully automatic.

Website crawling is performed with a customized version of the open-source Crawlee tool¹³, enabling automatic identification and indexing of website pages. What constitutes a website is determined by the main domain that the pages are linked to.

Up to 750 pages are tested on each website.

- The homepage of the website is always included
- Pages are identified and picked by following links in the website hierarchy

In simplified monitoring the testing is conducted using QualWeb¹⁴, an open-source tool developed by the University of Lisbon specifically for assessing accessibility on Portuguese public websites.

The QualWeb testing framework is primarily based on the World Wide Web Consortium (W3C) Accessibility Conformance Testing (ACT) rules¹⁵ - standardized guidelines for web accessibility testing. The tool is continuously updated to incorporate new ACT rules as they are approved by the W3C Accessibility Guidelines Working Group (AGWG).

Additionally, rules under review by the AGWG are provisionally implemented, providing users early access to forthcoming standards. As a free and open-source tool, QualWeb is accessible to website and app owners who seek to regularly assess and maintain compliance with accessibility standards.

2.3.5 Access to the results of simplified monitoring

We plan to publish a compilation of results from simplified monitoring is on our website. In this overview anyone will be able to find, access and compare the results and filter on different parameters.

Individual results per public sector body

The results will be public and made available on our website, utilsynet.no. It will be possible to export the data to other formats. We plan to present individual results for each public sector body in various views, e.g.

- Summary of the results including the score

¹³ [Crawlee](#)

¹⁴ [About QualWeb](#)

¹⁵ [W3C ACT-rules](#)

- Detailed results and outcomes
- Links to relevant information and guidance
- Comparison with previous results and development (if relevant)
- Pages and content with the most errors
- Metadata about the monitoring and testing performed

Note: The Authority is still working on the module for presentation of the results from simplified monitoring.

2.3.6 Guidance to the public sector bodies after simplified monitoring

Knowledge and improvement

The primary purpose of simplified monitoring is to inform the public sector bodies about areas of non-compliance and provide guidance on meeting the accessibility requirements.

Results can be used as a foundation for correcting errors and implementing improvements to enhance the accessibility of their websites.

Webinars on common errors and how to correct them

After the results have been published, The Authority plans to hold a free joint webinar where we will present common errors found and give guidance on how these errors can be corrected and /or avoided in the future.

2.3.7 Input to sampling for in-depth monitoring

The results will also be used as input to decide which public sector bodies and websites will be selected for in-depth monitoring.

Entities with a consistently low score will be more likely to be selected for further monitoring. The results will be supplemented by input from consulting stakeholders, tips from the public and insights obtained through other related activities.

In addition, The Authority plan to use information and results from simplified monitoring for various other purposes, for example

- Analyses and statistics
- Priorities going forward
- Reporting

2.4 Dialogue with User Organizations

The Authority invites organisations representing the interests of persons with disabilities and the elderly (user organizations) to annual dialogue meetings. Through these discussions, we gain valuable knowledge about the challenges faced by their members in navigating the digital society.

For a list of organisations who participated in the 2024-meetings see ANNEX I.

2.4.1 Key Topics

Key topics discussed in these meetings include:

- Digital participation and exclusion
- Digital barriers
- WAD and web accessibility statements
- Monitoring activities
- Results of the monitoring

2.4.2 Insight Through Dialogue

We find these meetings to be an effective way to gain insights into relevant topics and to understand where users face difficulties. We deepen our understanding of the challenges, complementing the knowledge gathered through other activities.

Experiences and perspectives from user organizations are incorporated into our work and inform our dialogue with other stakeholders.

2.4.3 Questionnaire for Structured Feedback from User Organizations

The Authority has developed a questionnaire, planned for annual distribution to user organizations from 2025. This allows organizations to report websites, apps and/or industries or highlight specific requirements they consider particularly important.

The information gathered is planned to be utilized as part of our sampling process for future monitoring periods.

3 DESCRIPTION OF THE MONITORING ACTIVITIES

3.1 Composition of the sample

3.1.1 Size of the sample

The number of websites selected for simplified monitoring was determined using the formula outlined in section 2.1.3. In Norway the population for the 2nd quarter of 2024 is 5 571 634¹⁶. For Norway, the required sample size from year three onward is 243¹⁷.

However, since automated testing has indicated that certain webpages might pose challenges for testing, the sample size was increased to 255 to ensure an adequate number of viable websites in the final sample.

3.1.2 Description of the sample

As mentioned in chapter 1.4 the monitoring activities in Norway are delayed.

Only a pilot for simplified monitoring has been carried out in this reporting period. For 2024 the sample was comprised of 255 public sector entities.

The distribution of the sample across levels of administration

The number of entities in the sample for each of the four levels of administration is presented in the table below.

Table 3 The distribution of the sample across levels of administration

Levels of administration	Number of entities in sample
(a) state websites	57
(b) regional websites	4
(c) local websites	93
(d) websites of bodies governed by public law not belonging to categories (a) to (c)	94
(d) websites of bodies governed by public law not belonging to categories (a) to (c) - (churches and parishes)	7
Total	255

Table 3 presents the distribution of the sample across different levels of administration.

The largest group is websites governed by public law (95 entities). Local websites also contribute significantly to the sample, with 93 entities included. State websites form a

¹⁶ [Population – SSB](#)

¹⁷ Calculations in ANNEX III

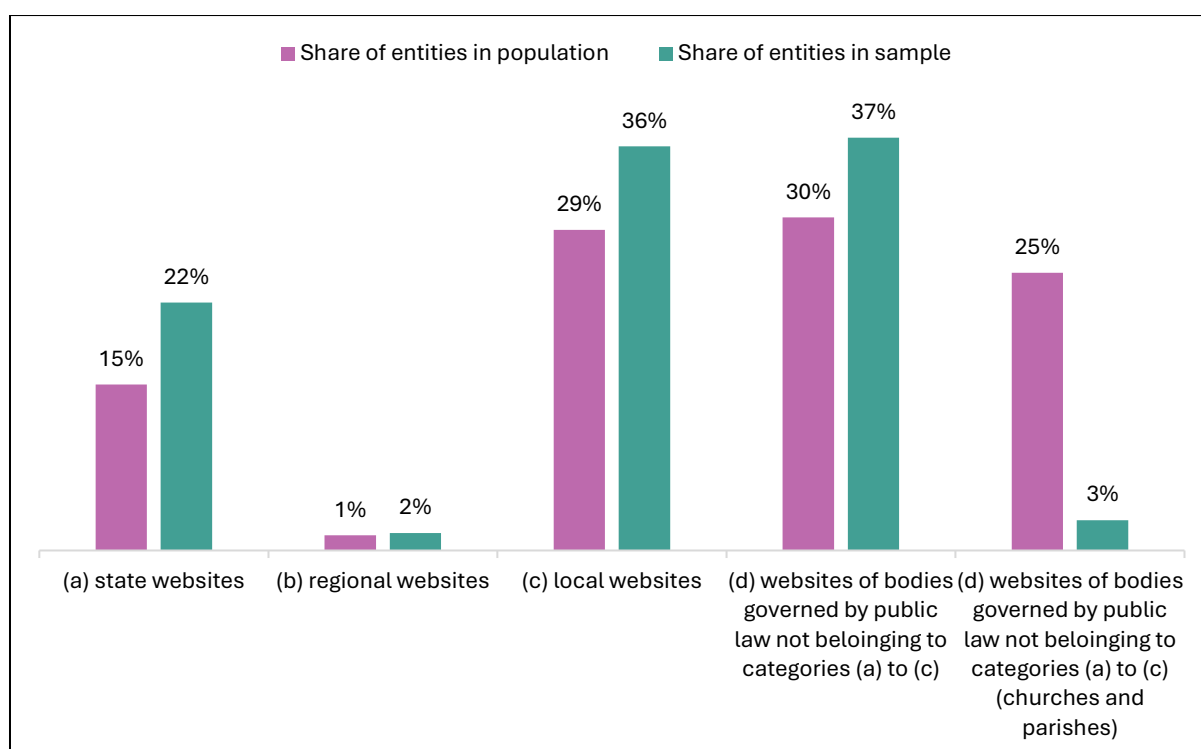
smaller but notable portion (57 entities), while regional websites are the least represented, with only four entities.

Figure 1 shows the share each group comprises of in both the population and the sample.

Due to the organizational structure of churches and parishes in Norway we have decided to treat this group differently than the rest. We have separated all the churches and parishes into a sub-category of (d) and set a max number of entities drawn from this group to 10.

The reason for this is that there are disproportionately many entities, but a large share of these uses the same website. This explains why the share of the groups are not more similar.

Figure 1 Share of entities in sample compared with population across levels of administration



The distribution of the sample across different services

Table 4 presents the number of entities across the groups in the standard Industrial Classification 2007 (SIC 2007).

As expected, the largest group is public administration, defence and social security as all the municipalities and counties sort under this category. There are 19 entities from human health and social work, and 15 entities from arts, entertainment and recreation.

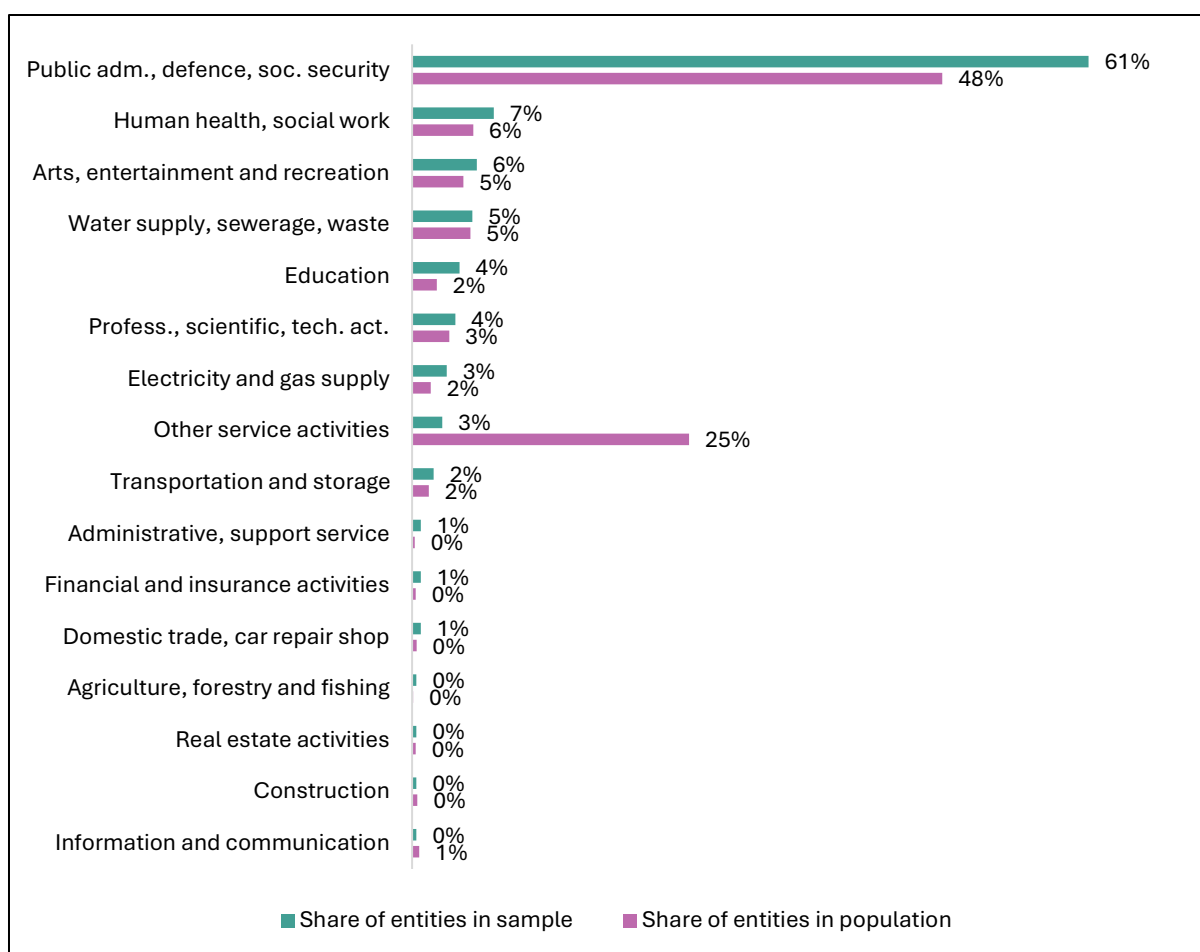
Table 4 The distribution of the sample across industrial classification

Standard Industrial Classification 2007 (SIC 2007)	Number of entities in sample
Public admin., defence, soc. security	157
Human health, social work	19
Arts, entertainment and recreation	15
Water supply, sewerage, waste	14
Education	11
Profess., scientific, tech. act.	10
Electricity and gas supply	7
Other service activities	7
Transportation and storage	5
Administrative, support service	2
Domestic trade, car repair shop	2
Financial and insurance activities	2
Agriculture, forestry and fishing	1
Construction	1
Information and communication	1
Real estate activities	1
Total	255

Figure 2 compares the share of entities in the population and the sample across the Standard Industrial Classification 2007.

The most notable observation is that public administration, defence and social security is over-represented and that “Other service activities” is under-represented. This is primarily due to the special consideration given to churches and parishes.

Figure 2 Share of entities in sample compared with population across industrial classification



The distribution of the sample across geography

Table 5 presents the number of entities in the sample across the Norwegian counties.

The number of entities is sampled to recreate the number of entities in the population, proportional to the total sample size. This shows that Oslo has the largest number of entities in the sample with 34 entities, and Buskerud and Vestfold have lowest numbers of entities with nine and seven respectively.

Table 5 The number of entities in sample by county

County	Number of entities in sample
Oslo	34
Trøndelag - Tröndelage	29
Vestland	25
Nordland - Nordlännda	23
Innlandet	20
Agder	17
Rogaland	16
Møre og Romsdal	15
Telemark	14
Østfold	13
Akershus	11
Finnmark - Finnmarkku - Finmarkku	11
Troms - Romsa - Tromssa	11
Buskerud	9
Vestfold	7

Figure 3 shows a comparison of the share of entities in the sample with the share of entities in the population for the different counties.

Figure 3 Share of entities in sample compared with population across counties

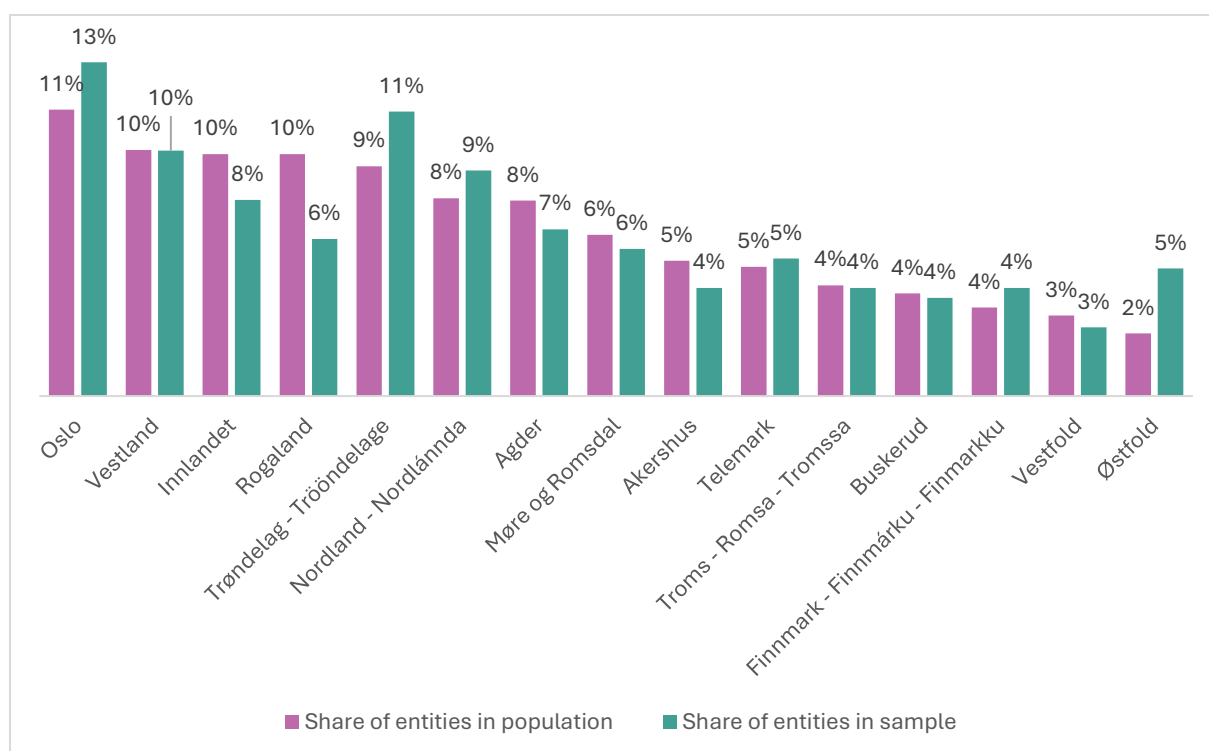


Figure 3 shows that the counties Oslo, Trøndelag and Østfold is over-represented in the sample, while Innlandet, Rogaland and Agder are underrepresented.

The reason for this is as previously mentioned, the special consideration given to churches and parishes in the sampling methodology, which includes a cap on the maximum number of entities. As these entities are not evenly distributed, a limitation leads to the observed variation in representation across regions.

3.2 Correlation with the standards, technical specifications and tools used for monitoring

In total, the subset of 14 European standard *EN 301 549* clauses tested by 30 QualWeb's ACT rules to detect non-compliance, presented in Table 6.

This covers all four principles of the Web Content Accessibility Guidelines (WCAG) that are perceivable, operable, understandable, and robust referred to in Article 4¹⁸ of WAD, along with the 14 corresponding WCAG success criteria.

The Coverage rate compared to the total clauses in Chapter 9 of *EN 301 549* is 28,5% of those tested. However, it covers the minimum requirements referred to in Article 4 of WAD.

Table 6: *EN 301 549* clauses and corresponding WCAG success criteria, tested by QualWeb's ACT rules¹⁹

¹⁸ [WAD - Article 4](#)

¹⁹ [QualWeb ACT-rules](#)

No.	EN Clause	WCAG SC	SC description	QualWeb's ACT Rules
1	9.1.1.1	1.1.1	Non-text content	• QW-ACT-R17 – Image has non-empty accessible name • QW-ACT-R21 – SVG element with explicit role has non-empty accessible name • QW-ACT-R42 – Object element rendering non-text content has non-empty accessible name
2	9.1.3.1	1.3.1	Info and relationships	• QW-ACT-R33 – ARIA required context role • QW-ACT-R36 – Headers attribute specified on a cell refers to cells in the same table element • QW-ACT-R38 – ARIA required owned elements • QW-ACT-R39 – Table header cell has assigned cells
3	9.1.3.4	1.3.4	Orientation	QW-ACT-R7 – Orientation of the page is not restricted using CSS transform property
4	9.1.3.5	1.3.5	Identify Input Purpose	QW-ACT-R24 – autocomplete attribute has valid value
5	9.1.4.3	1.4.3	Contrast (Minimum)	QW-ACT-R37 – Text has minimum contrast
6	9.1.4.4	1.4.4	Resize Text	QW-ACT-R14 – Meta viewport allows for zoom
7	9.1.4.12	1.4.12	Text Spacing	• QW-ACT-R67 – Letter spacing in style attributes is not !important • QW-ACT-R68 – Line height in style attributes is not !important • QW-ACT-R69 – Word spacing in style attributes is not !important
8	9.2.1.1	2.1.1	Keyboard	• QW-ACT-R43 – Scrollable element is keyboard accessible • QW-ACT-R70 – Iframe with interactive elements is not excluded from tab-order
9	9.2.2.1	2.2.1	Timing Adjustable	QW-ACT-R4 – Meta element has no refresh delay
10	9.2.4.2	2.4.2	Page Titled	QW-ACT-R1 – HTML page has non-empty title
11	9.2.5.3	2.5.3	Label in Name	QW-ACT-R30 – Visible label is part of accessible name
12	9.3.1.1	3.1.1	Language of Page	• QW-ACT-R2 – HTML page has lang attribute • QW-ACT-R5 – HTML page lang attribute has valid language tag

13	9.3.1.2	3.1.2	Language of Parts	QW-ACT-R22 – Element with lang attribute has valid language tag
14	9.4.1.2	4.1.2	Name, Role, Value	• QW-ACT-R6 – Image button has non-empty accessible name • QW-ACT-R11 – Button has non-empty accessible name • QW-ACT-R12 – Link has non-empty accessible name • QW-ACT-R13 – Element with aria-hidden has no content in sequential focus navigation • QW-ACT-R16 – Form field has non-empty accessible name • QW-ACT-R19 – Iframe element has non-empty accessible name • QW-ACT-R65 – Element with presentational children has no focusable content • QW-ACT-R66 – Menu item has non-empty accessible name

3.2.1 Correlation of functional performance statements (FPS) with EN 301 549 clauses

Table 7 presents an overview of the correlation between functional performance statements (FPS) and specific clauses in the EN 301 549 standard tested in this monitoring activity, detailing primary and secondary relationship²⁰.

Table 7: Correlation of functional performance statements (FPS) with EN 301 549 clauses

ANNEX I Ref.	Functional Performance Statement	EN 301 549 clause (Primary relationship)	EN 301 549 clause (secondary relationship)	Total
1.3.2 (a)	Usage without vision (WV)	8	0	8
1.3.2 (b)	Usage with limited vision (LV)	9	3	12
1.3.2 (c)	Usage without perception of colour (WPC)	1	0	1
1.3.2 (d)	Usage without hearing (WH)	2	2	4
1.3.2 (e)	Usage with limited hearing (LH)	1	3	4
1.3.2 (f)	usage without vocal capability (WVC)	0	1	1
1.3.2 (g)	Usage with limited manipulation or strength (LMS)	5	2	7
1.3.2 (h)	The need to minimise photosensitive seizure triggers (PST)	2	0	2
1.3.2 (i)	Usage with limited cognition (LC)	3	7	10

1.3.2 (a) Usage Without Vision (WV)

Eight EN 301 549 clauses address the primary requirements for usage without vision, while none are dedicated to secondary requirements. This indicates that the fundamental needs of blind users are effectively supported by a core set of standards, including features such as screen reader compatibility, auditory feedback, and tactile navigation.

²⁰ WAD - Annex I, section 1.3.2.

1.3.2 (b) Usage with Limited Vision (LV)

This category features the highest number of EN clauses, with nine addressing primary needs and three covering secondary needs. This highlights a strong emphasis on accessibility for users with limited vision, focusing on key aspects such as sufficient colour contrast, content magnification, and other visual adjustments to enhance usability.

1.3.2 (c) Usage Without Perception of Colour (WPC)

Only one EN-clause addresses the primary needs of users without colour perception, such as individuals who are colourblind, with no clauses dedicated to secondary needs. This reflects the relatively straightforward nature of these requirements, which are typically met through contrast adjustments that avoid reliance on colour differentiation.

1.3.2 (d) Usage Without Hearing (WH)

This category is covered by two EN-clauses each for primary and secondary requirements, highlighting essential adaptations for deaf users. Key features include captions for audio content and visual indicators for auditory cues.

1.3.2 (e) Usage with Limited Hearing (LH)

The specific needs of users with partial hearing loss are addressed by one EN-clause for primary requirements and three for secondary requirements. Adaptations include adjustable volume controls and frequency modulation to ensure audio clarity for varying hearing ranges.

1.3.2 (f) Usage Without Vocal Capability (WVC)

This category is represented by a single EN-clause addressing secondary needs, with no clauses for primary requirements. This limited coverage reflects the availability of text-based communication options in most ICT systems, which sufficiently support users unable to speak.

1.3.2 (g) Usage with Limited Manipulation or Strength (LMS)

Five EN-clauses cover primary needs, while two address secondary needs in this category. These clauses focus on users with motor disabilities by enabling simplified navigation and reducing the physical effort required to interact with ICT systems.

1.3.2 (h) Minimizing Photosensitive Seizure Triggers (PST)

Two EN-clauses cover primary requirements in this category, with no clauses addressing secondary needs. These clauses aim to reduce the risk of photosensitive epilepsy by avoiding visual stimuli such as flashing lights or patterns that could trigger seizures.

1.3.2 (i) Usage with Limited Cognition (LC)

This category receives comprehensive attention, with three EN-clauses addressing primary needs and seven focused on secondary needs. These standards aim to make ICT systems accessible for users with cognitive limitations by simplifying navigation and reducing complexity.

4 IMPLEMENTATION OF WEB ACCESSIBILITY STATEMENT AND OUTCOME

4.1 Description and outcome on implementation of Web Accessibility Statement

The Norwegian Digitalisation Agency has developed a centralized solution for web accessibility statements (WAS-solution), which complies with the directive's requirements. It simplifies the process for public sector bodies to publish statements for their websites and apps.

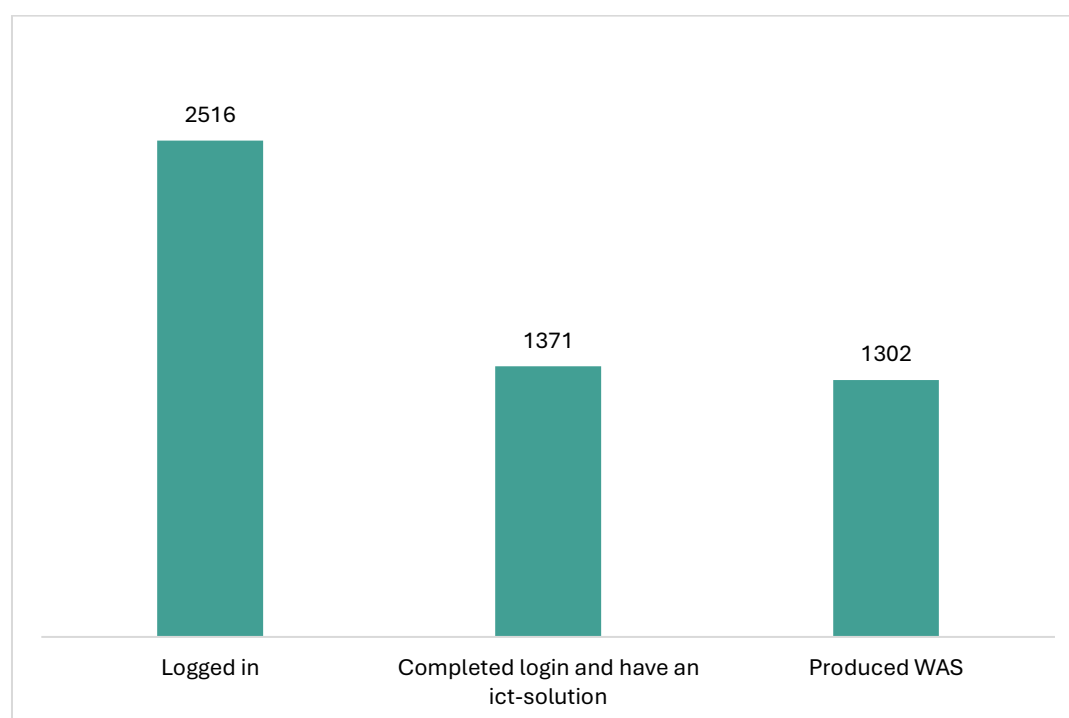
For users, the statement provides an overview of any issues with websites and apps. Additionally, the WAS includes a feedback mechanism, making it easy for users to report issues they encounter back to the entity.

The Authority uses the WAS-database as a source of information, including for maintaining a register of businesses and ICT solutions²¹, providing guidance, and generating statistics and analysis. This can include assessing compliance status and selecting businesses for simplified or in-depth monitoring.

4.1.1 Use of the WAS-solution

The centralized WAS-solution gathers data about the entities that uses it.

Figure 4 Number of entities at each stage in the WAS-solution process



²¹ The term ICT-solutions include bot websites and apps

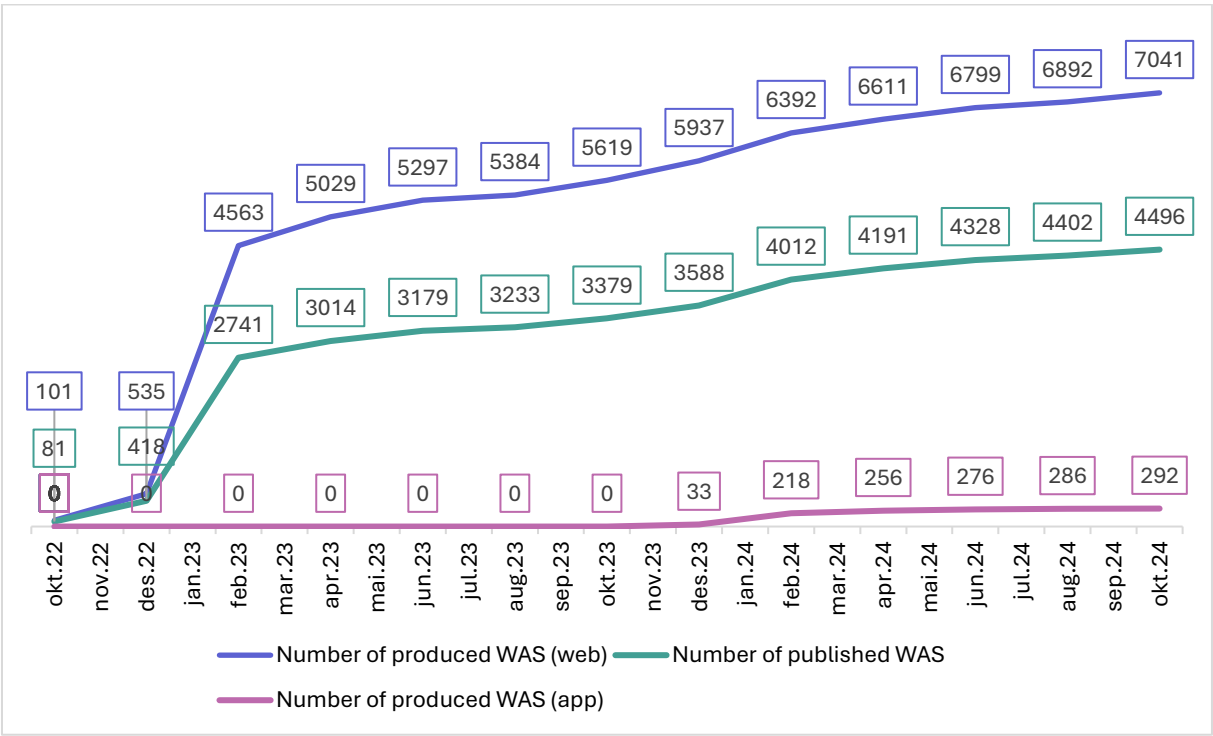
As of the writing of this report 2516 entities have logged in to the WAS-tool. There are 1371 entities that have logged in and reported that they have either a website or an app. 1302 entities has produced an accessibility statement.

Number of statements produced and published

As of October 2024, the number of produced statements²² are 7041, shown in Figure 5.

After the quick rise when WAD came in to force in early 2023 (from 0 to about 4500 in February 2023) the number of produced statements has steadily increased to over 7 000. Figure 5 Number of produced WAS for web and app, and number of published WAS

Figure 5 Number of produced WAS for web and app, and number of published WAS



4496 statements are certified published. This means that the automated check (crawler robot) has been able to find the statement by crawling the front-page. The logic for the automated check is under continuous improvement, and the real number of published WAS's is expected to be higher than reported in Figure 5.

In early 2024, the WAS-solution was extended with a separate form for apps. The number of produced statements for apps have reached 292 by October 2024. The Authority are working on measures to increase the number of statements for apps and hope for positive results in the next reporting period.

²² A statement is produced when the form is completed, and the entity confirms that the information is correct. A statement is published when the link to the produced statement is published on a specified place on the entity's website.

4.1.2 Level of compliance

The overall compliance percentage is 82 %. This means that 82 % of the success criteria across all the websites and apps have been reported as being compliant (this figure does not include non-occurrence).

Figure 6 shows the five WCAG success criteria with the lowest compliance percentage.

Figure 6 The five success criteria with lowest compliance percentage

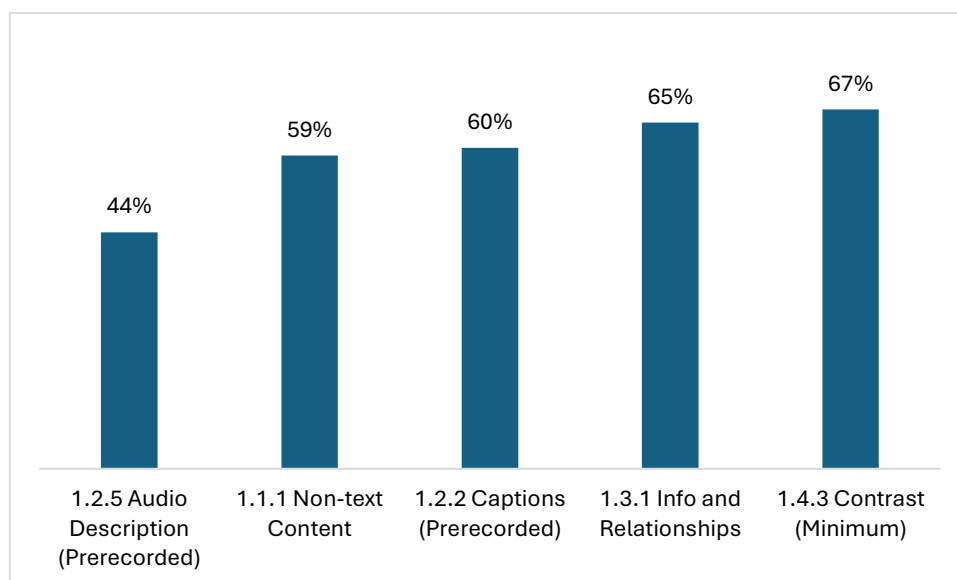


Figure 6 shows that only 44 % of the produced statements is compliant with success criteria 1.2.5 Audio Description (prerecorded), and 59 % of the produced statements is compliant with success criteria 1.1.1 Non-text Content.

Success criteria 1.2.2 states that captions should be provided for all prerecorded media. 60 % of statements report compliance with this success criteria.

Relationships between visual presentation and source code is covered in Success criteria 1.3.1 Info and Relationships, 65 % of the entities reported compliance on this success criteria for their ICT-solution.

Finally, sufficient contrast is important for people with limited vision. 67 % of the produced statements have reported compliance with success criteria 1.4.3 Contrast (Minimum).

4.1.3 The use of disproportionate burden

When a public sector body registers a non-compliance in their WAS, they must give a reason. There are three possible reasons for each success criteria (where the entity can check more than one for each, as the answer might address different content on the website).

The possible reasons are:

- non-compliance
- content is not covered
- disproportionate burden.

The responses on verified published WAS the data shows that only 2,7 % of non-compliance is due to disproportionate burden.

Figure 7 Number of non-compliance due to disproportionate burden

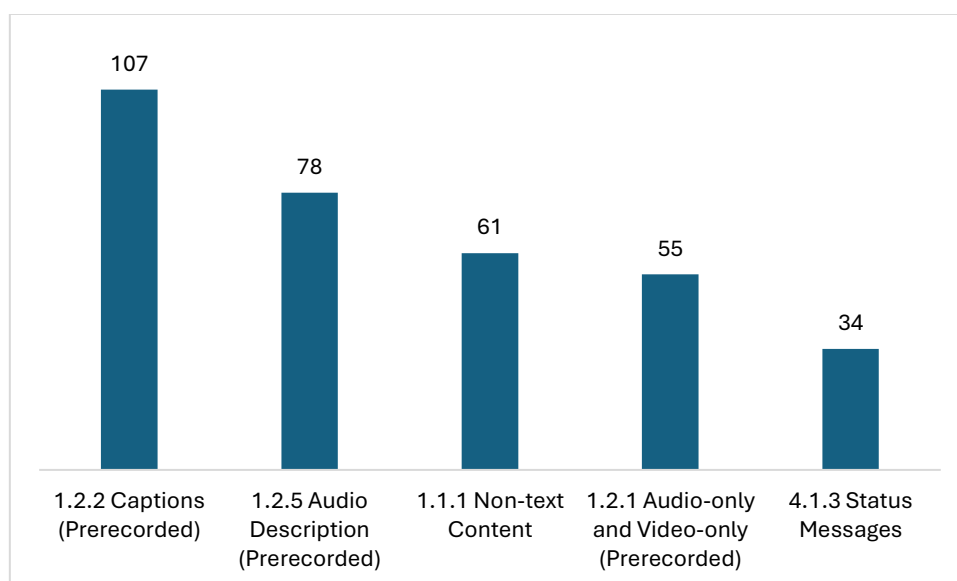


Figure 7 shows the number of instances where the public sector bodies have cited disproportionate burden as a reason for non-compliance in their web accessibility statements.

Success criteria 1.2.2 Captions (Prerecorded) is most frequently cited with 107 instances, suggesting that creating captions for prerecorded content is perceived as particularly resource intensive. This is followed by 1.2.5 Audio Description (Prerecorded) at 78 instances, reflecting similar challenges with providing descriptive audio for visual content.

Success criteria related to more general accessibility issues, such as 1.1.1 Non-text Content (61 instances) and 1.2.1 Audio-only and Video-only (Prerecorded) (55 instances), are cited somewhat less frequently. These criteria ensures that all content is accessible via alternative formats. The success criteria 4.1.3 Status Messages is the least frequently cited, at 34 instances.

5 DETAILED OUTCOME OF THE PILOT-MONITORING

5.1 Detailed outcome simplified monitoring of websites

The average score across the 255 entities for the simplified monitoring in 2024 was 91 out of 100 (Se ANNEX II for the calculation method of the score).

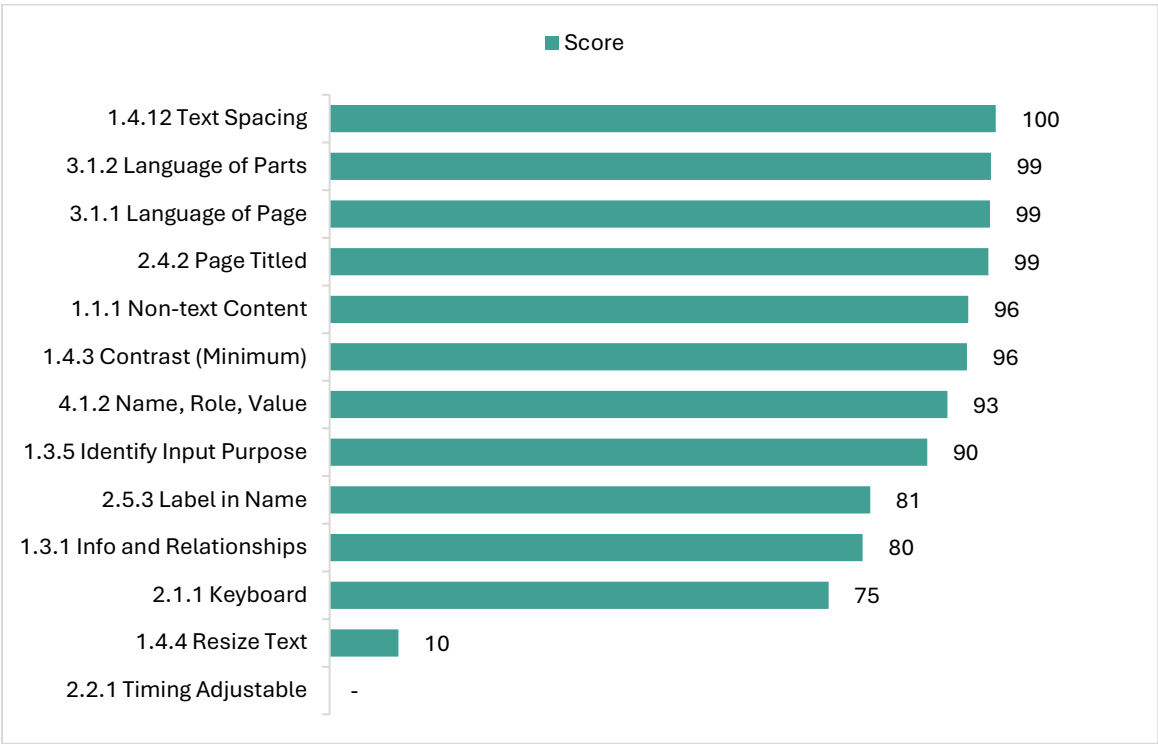
The crawler, configured to analyse a maximum of 750 pages, returned an average of 459 pages per website.

A total of 410 874 non-compliant elements were found.

5.1.1 Results by success criteria

Figure 8 under presents the results categorized by success criteria.

Figure 8 Score by success criteria



The data reveals consistently high scores across most criteria. Notably, Success Criterion 1.4.12 – Text Spacing achieved the highest score of 100 points, with no instances of non-compliance identified, making it the only criterion with a perfect compliance record.

This trend is followed by success criteria 3.1.2 – Language of Parts, 3.1.1 – Language of Page, 2.4.2 – Page Titled, with score 99 points. These high scores indicate that the tested websites effectively support text customization and language identification both on page and content level, ensuring compatibility with assistive technology.

Additionally, the webpages provide titles that can describe topic or purpose of the content on these pages for users with different accessibility needs²³.

The success criteria 1.1.1 – Non-text Content, 1.4.3 – Contrast (Minimum), 4.1.2 – Name, Role, Value, and 1.3.5 – Identify Input Purpose, scored over 90 points. These scores indicate generally good accessibility, especially for visually impaired users that depends on assistive technology such as screen reader or braille, and sufficient colour contrast.

However, there is still room for improvement. Even minor improvements can further enhance the accessibility of tested websites, further improving the user experience for individuals with specific accessibility needs.

The success criteria 2.5.3 – Label in Name, 1.3.1 – Info and relationships, and 2.1.1 – Keyboard scored moderate that is 81, 80, and 75 points respectively. These scores indicate some inconsistencies between visible labels and accessible names, which make the use of tested websites difficult for speech-input and text-to-speech users. The 80 points score on success criterion 1.3.1 – Info and relationships, indicates that some visual structural information and relationships such as lists, headings, tables etc. are not fully programmatically determined.

This can hinder visually impaired users who depend on assistive technology to understand content structure, relationships, and navigation. Furthermore, success criterion 2.1.1 – Keyboard with score of 75 points indicates certain content might not be fully keyboard accessible, potentially limiting access for users with visual and motor impairments.

Success criterion 1.4.4 – Resize Text has the lowest score that is 10 points, which highlights significant limitations for users that require larger text for readability. The users with low vision can find it challenging to navigate or read the text content without resizing the text up to 200 percent.

Success criterion 2.2.1 – Timing Adjustable with no score, indicates that this criterion was evaluated but is not applicable for contents of the tested websites. This suggests that users who need more time to interact with content (such as users with motor impairments or cognitive disabilities) can complete tasks without unexpected changes in content or context that are a result of a time limit.

The scoring indicates that while many of the success criteria achieved high scores and certain accessibility features are robust, there remain critical gaps that hinder users with visual, cognitive and/or motor impairment. Improving low-scoring areas would

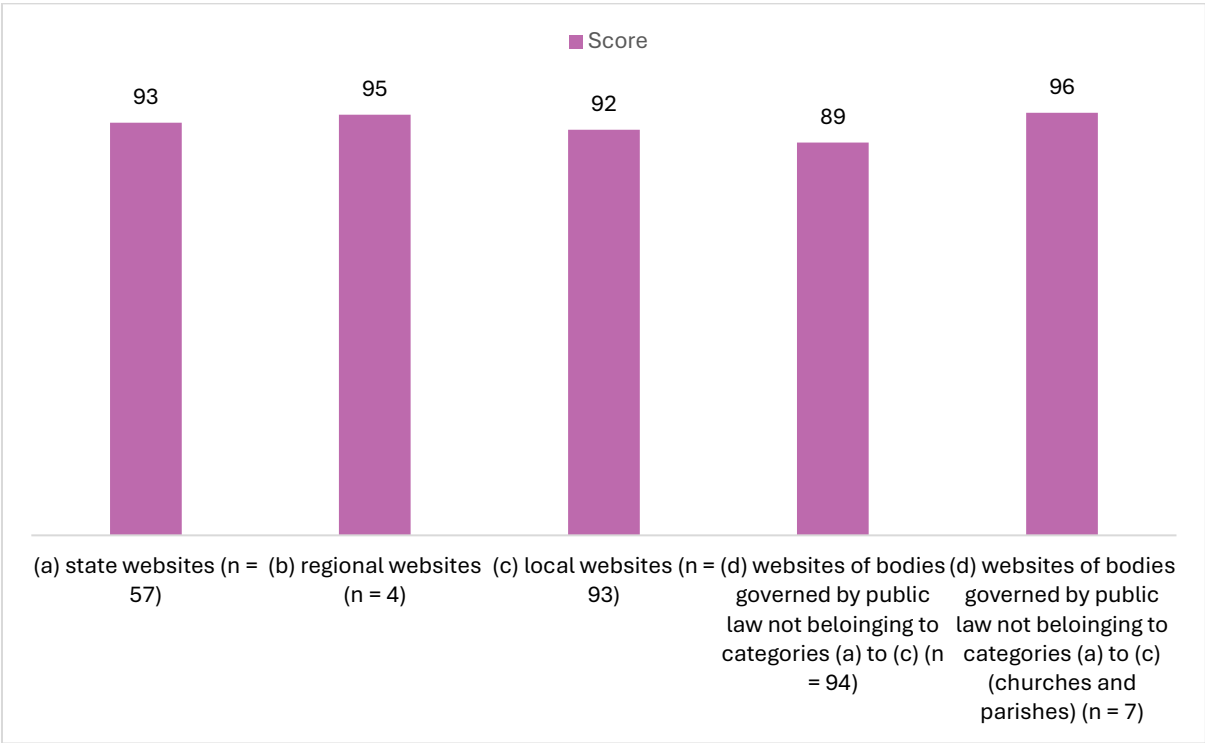
²³ WAD - Annex I, section 1.3.2

make the content more accessible, would enhance the accessibility for a broad range of users and ensure a greater compliance with the EN 301 549 standard.

5.1.2 Results by administration level

Figure 9 shows the accessibility score for the different administration levels.

Figure 9 Accessibility score by administration level



Churches and parishes have the highest score of 96, followed by regional websites with a score of 95. Keep in mind that these categories have the smallest sample size of the four categories (4 and 7 websites respectively), and the results may therefore be influenced by chance.

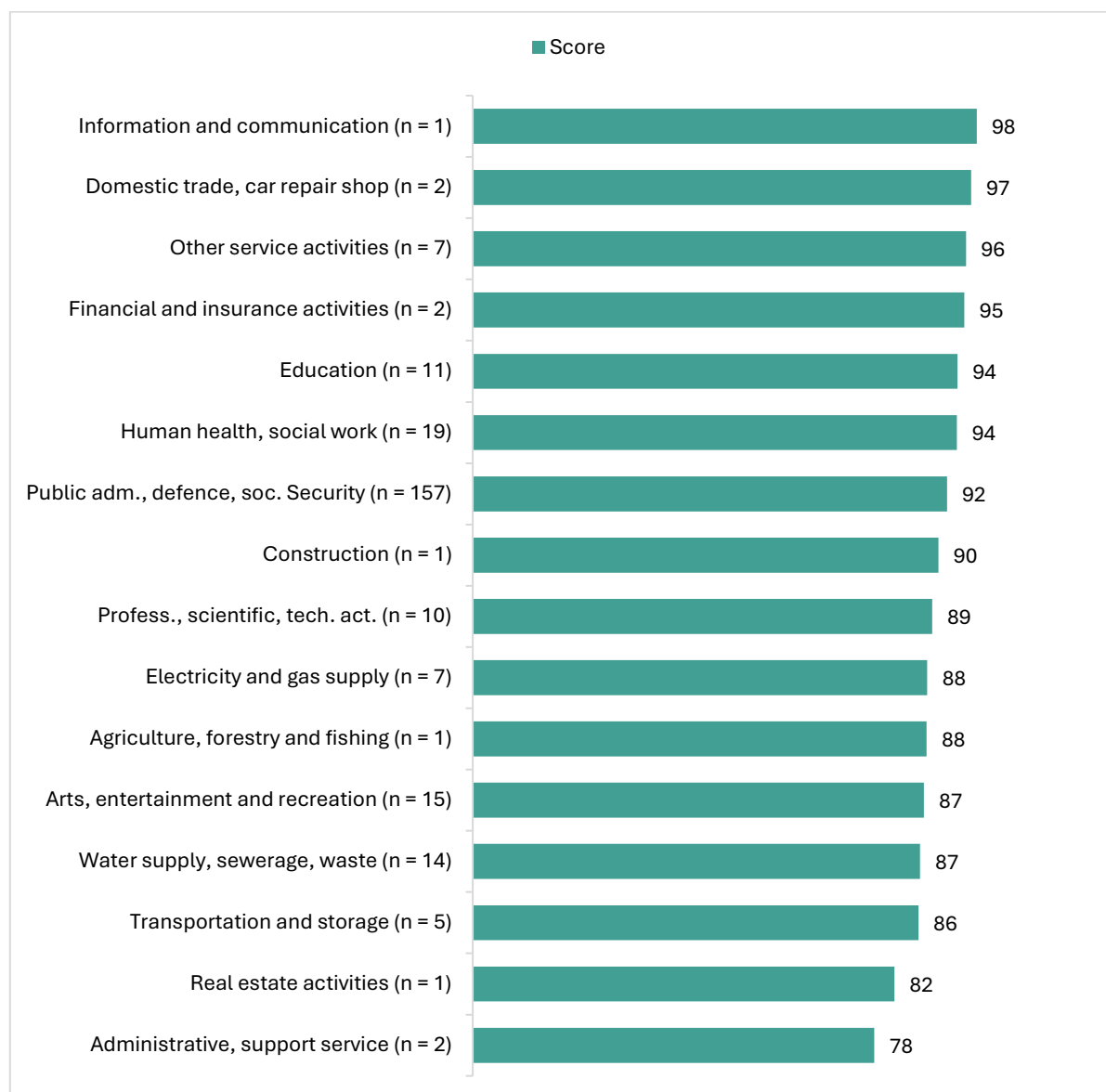
All the remaining categories have sufficient sample sizes. State websites have 57 entities, local websites 93 and websites of bodies governed by public law not belonging to categories a to c have 94 entities.

The scores vary from 93 (states websites) to 89 websites of bodies governed by public law not belonging to categories a to c. Local websites have a score of 92. The results show a relatively low level of non-compliance in the tests performed across the administration levels.

5.1.3 Results by services

Figure 10 shows accessibility scores by service. Scores range from 78 to 98, indicating variability in the monitoring results.

Figure 10 Accessibility score by service



The highest scores are observed in "Information and communication" (98), "Domestic trade, car repair shop" (97), and "Other service activities" (96).

The services "Information and communication," "Agriculture, forestry and fishing," and "Construction," scored relatively high (98, 88, and 90, respectively). However, these sectors have limited representation, so these high scores may not be fully indicative of sector-wide performance.

Lower scores are found in "Administrative and support service activities" (78) and "Real estate activities" (82). As the sample sets out to be representative of the population, some of the sub-groups have a small number of entities. Although the complete sample

is representative of the population the total sample does not support generalizations in every sub-group (as the sample in each sub-group is too small)

The "Public administration, defence, and social security" sector, with 157 entities, scored 92, which is relatively high. "Human health and social work" and "Education" sectors, with scores of 94, are also well-represented, with 19 and 11 entities, respectively.

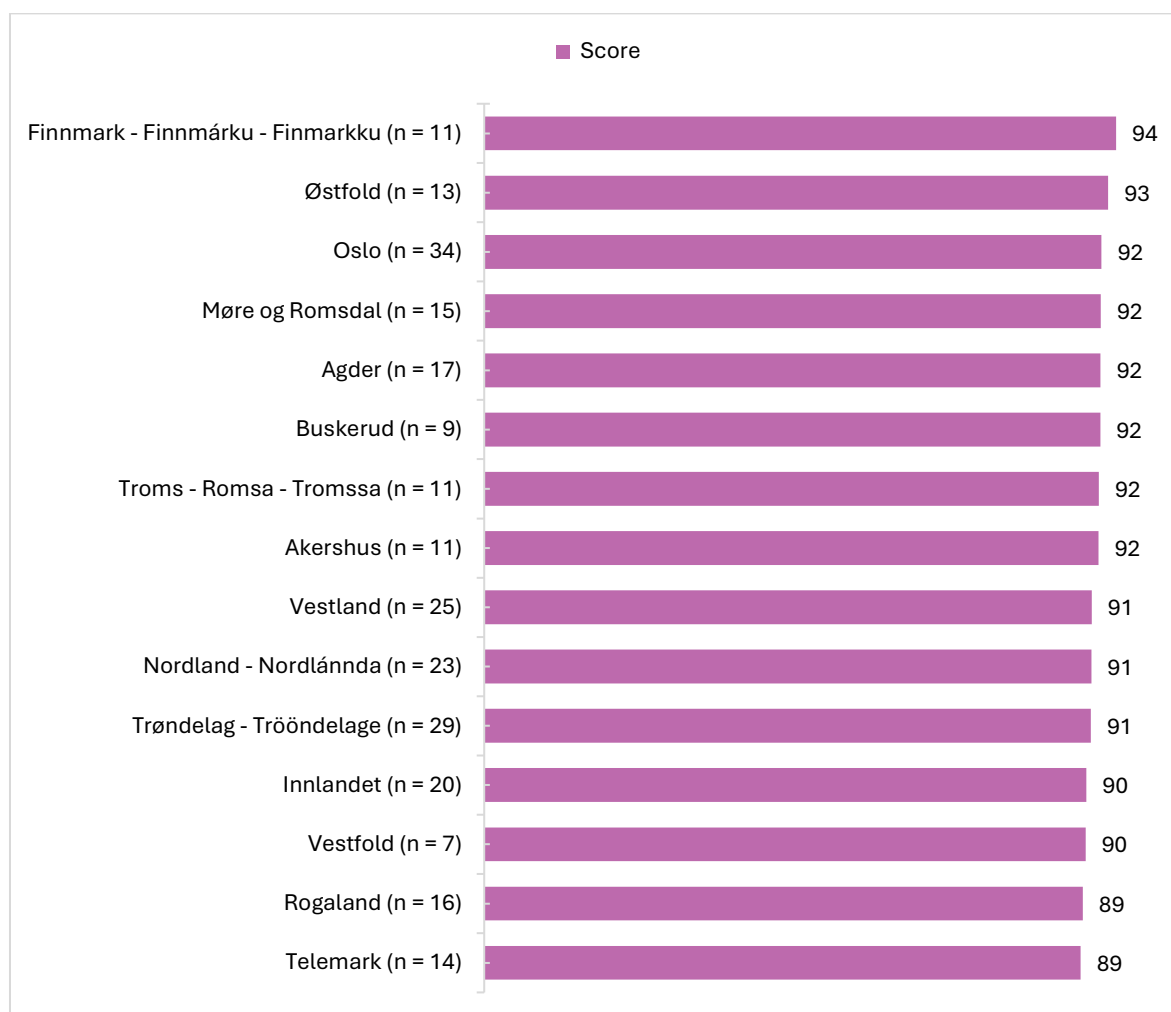
The accessibility scores across sectors indicate a relatively high level of compliance. The relatively high scores in sectors like public administration, health, and education suggest effective accessibility measures.

5.1.4 Results by geography

Figure 11 shows accessibility scores by county in Norway, showing the variation in accessibility scores across different counties.

Accessibility scores range from 89 to 94, indicating that most counties are performing relatively well on accessibility standards, with minor variations in performance levels.

Figure 11 Accessibility score by county



The counties with the highest scores are Østfold (93) and Finnmark (94). Oslo, which has the largest number of sampled entities (34), also performs well with a score of 92. The lowest scores are found in Telemark and Rogaland with scores of 89.

In conclusion, the data reveals a generally high standard of accessibility across Norwegian counties, with scores clustered between 89 and 94.

6 USE OF THE ENFORCEMENT PROCEDURE AND END-USER FEEDBACK

6.1 *Enforcement procedure*

The enforcement procedure set out in WAD article 9 cf. article 5 and article 7, is primarily handled by The Anti-Discrimination Tribunal²⁴ and The Gender Equality and Anti-Discrimination Ombud²⁵ (LDO).

The Anti-Discrimination Tribunal is a neutral and independent administrative body that does not represent or assist either party. They handle individual complaints from users regarding possible discrimination. This also includes the requirements on universal design of ICT, accessibility statements and the public sector body initial assessment of disproportionate burden.

During in-depth monitoring The Authority can review a public sector body's initial assessment and use of disproportionate burden and overturn it if needed.

At the time of this report, we do not have any information about the use of the enforcement procedure from The Anti-Discrimination Tribunal or The Gender Equality and Anti-Discrimination Ombud.

²⁴ [The Anti-Discrimination Tribunal](#)

²⁵ [The Equality and Anti-Discrimination Ombud](#)

7 ADDITIONAL MEASURES

7.1 Information and guidance

Providing good quality information and guidance is our highest priority task.

7.1.1 The website utilsynet.no

The website utilsynet.no is the Authority's main channel for information and guidance to public sector bodies, private companies, end users, suppliers, the media and other stakeholders. It provides e.g.

- extensive guidance on the regulations
- how to meet the requirements
- tips on how to perform simple testing
- results from monitoring and audits
- data, statistics and analyses

Figure 12 Yearly number of visitors utilsynet.no

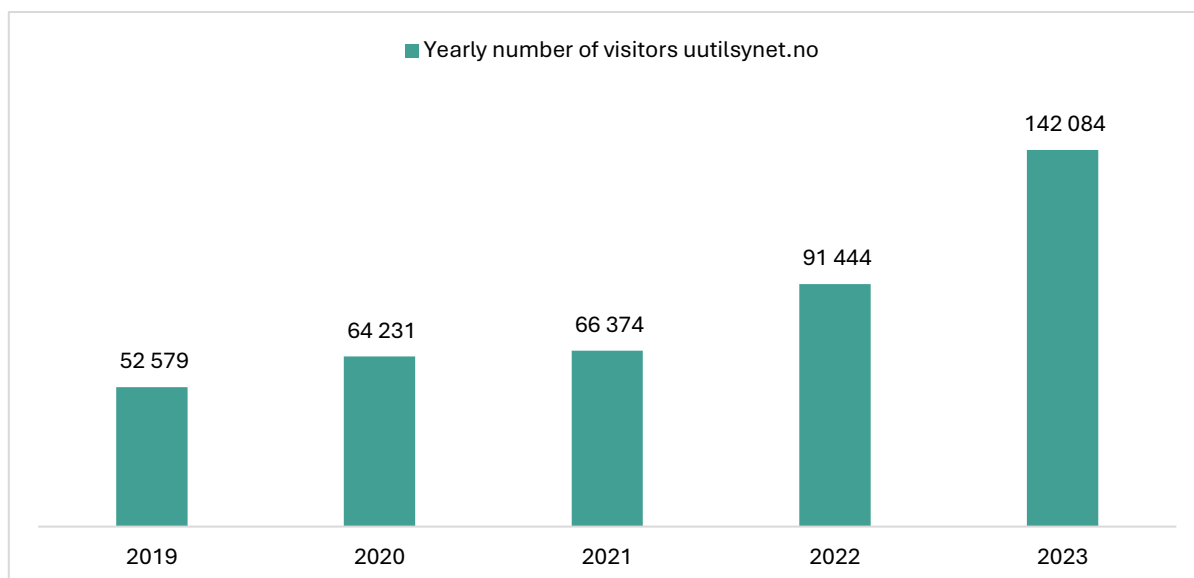


Figure 12 shows yearly visitors to utilsynet.no.

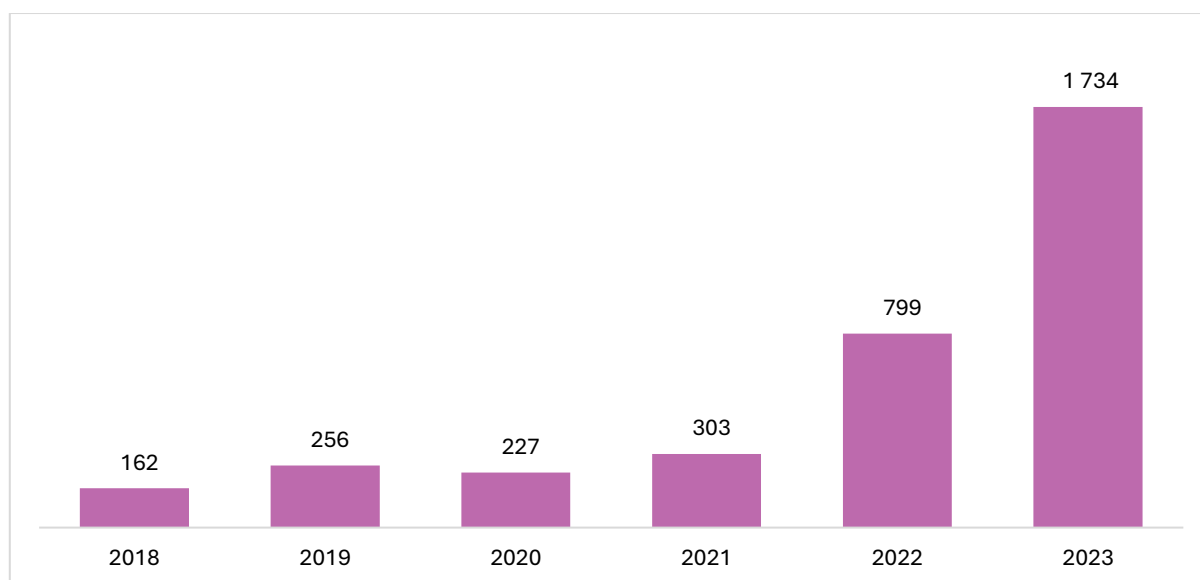
Visitor numbers increased from 52,579 in 2019 to 142,084 in 2023, with a notable jump between 2022 (91,444) and 2023. The number of visitors 64 231, 66 374 and 91 444 in year 2020, 2021 and 2022 respectively.

We will also use the website to make public any developments in accessibility policy relating to websites and apps. Additionally, these updates will be communicated through various channels, such as press releases and the Authority's social media platforms.

7.1.2 One on one communications

The Authority responds to inquiries we receive from public sector bodies, the private sector and others via email or telephone. The information and tasks are organised through TopDesk, a service management software for customer communications.

Figure 13 Number of inquiries



When WAD entered into force on 1 February 2023 we experienced a significant increase in the number of inquiries. Note that, Figure 13 covers both the private and the public sector. On average 75% of all inquiries come from public sector bodies.

7.2 Training and awareness-raising activities

7.2.1 Presentations and webinars

The Authority regularly delivers external presentations and hosts webinars aimed at raising awareness among our stakeholders, accessibility regulations and their purpose. These efforts seek to promote a deeper understanding of the regulations while fostering knowledge and practical skills in universal design and accessibility.

Through this, stakeholders gain insights into our activities, the outcomes of monitoring and different important topics relevant to universal design and accessibility. These presentations are both initiated by The Authority and given upon request and aims to ensure both proactive outreach and responsiveness to stakeholder needs.

By prioritizing these efforts, The Authority strengthens collaboration with public sector bodies, private entities, and other relevant groups, aiming to build a shared commitment to creating a more inclusive digital society.

7.2.2 Communication and media

We use our communication strategy to effectively realize the goals outlined in our strategy and execute planned communication efforts to meet The Authority's specific communication objectives.

The primary objectives of our communication efforts are to

- Ensure that the Authority can give clear and accessible information and guidance on the regulations for universal design of ICT, helping target groups and stakeholders understand and comply with the requirements.
- Establish broad awareness of the Authority's role, mandate, and responsibilities.
- Strengthen the internal anchoring and understanding of the Authority's supervisory functions and regulatory framework within Digdir.

Communication Goals:

- Support the achievement of the Authority's mandate and strategic objectives.
- Position the Authority as a visible and driving force in knowledge sharing and advocacy for accessibility.
- Provide targeted, actionable information and guidance to public sector bodies and private entities to ensure compliance with accessibility regulations.
- Foster strong interaction and dialogue with the industry and user organizations to build collaborative relationships.
- Engage with the media to share the Authority's key messages, updates, decisions, and accessibility-related news, to amplify our communication efforts.

By aligning our communication initiatives with our goals, we aim to support the broader mission of universal ICT accessibility.

7.3 Consulting relevant stakeholders

The Authority has annual meetings with both user²⁶- and industry organizations.

In these meetings stakeholders can give us input on different topics e.g. monitoring, guidance and other measures that needs to be taken to ensure compliance with the regulations.

This includes public sector bodies, sectors, areas of society, services, websites and apps that should be prioritized in the monitoring and other activities. It is also possible to give The Authority comments, insight and tips by e-mail.

7.4 Experiences from the implementation of WAD

7.4.1 EN 301 549 chapters 9, 10 and 11 - WCAG 2.1 level A and AA

The Norwegian regulations refer to EN 301 549 V3.2.1 (2021-03), cf. Regulation on Universal Design of ICT section 4b²⁷ first and second paragraph.

However, only the WCAG 2.1 success criteria in chapters 9,10 and 11 in the standard is part of the regulations. Only these requirements can be enforced in Norway. The

²⁶ As described in chapter 2.4

²⁷ Regulation on Universal Design of ICT [section 4b](#)

additional non-WCAG clauses stated in chapters 5 –12, was not impact assessed as part of the preparation and public consultation on WAD.

8 ANNEX I – CONSULTED ORGANIZATIONS

The following organizations was consulted in the dialogue meetings for 2024

- Norwegian Association of the Blind and Partially Sighted (Blindeforbundet)
- Dyslexia Norway (Dysleksi Norge)
- Parents of Blind Children (Foreldre til blinde barn, FTBB)
- The Norwegian Federation of Organisations of Persons with Disabilities (Funksjonshemmedes fellesorganisasjon, FFO)
- Parents' Association for Disabled Children (Handikappede barns foreldreforening, HBF)
- The Norwegian Association for the Hard of Hearing (Hørselshemmedes landsforbund, HLF)
- Norwegian Association of Disabled (Norges Handikapforbund, NHF)
- NHF Youth (Norges Handikapforbund, NHF)
- Norwegian Association for Persons with Intellectual Disabilities (Norsk forbund for utviklingshemmede, NFU)
- Norwegian Forum of Disabled Peoples' Organizations (Samarbeidsforumet av funksjonshemmedes organisasjoner, SAFO)
- Senior Net (Seniornett)
- The Centre for an age-friendly Norway (Senteret for et aldersvennlig Norge)

9 ANNEX II – METHOD FOR SCORING ACCESSIBILITY OF WEBSITES AND APPS

To be able to score a web solution, a test must have been conducted on the solution with at least one result showing either compliance or non-compliance. The test must provide detailed results on compliance/non-compliance at the element level. The scoring method is split into three steps:

1. A compliance percentage is calculated (the number of compliant elements divided by the total number of tested elements) per page per test criterion.
2. The score is aggregated to a score per solution per test criterion by averaging the scores for all pages of a solution for a test criterion.
3. The compliance percentage is further aggregated to scores at various levels by averaging the scores from (2).

In general, we can outline the method as follows:

Step 1: Score all pages for all test criteria

$$S_{STr} = \frac{\sum_{E=1}^f E_{fSTr}}{\sum_{E=1}^t E_{tSTr}} * 100$$

Step 2: Aggregate scores per page per test criterion to a score per solution per test criterion

$$S_{LTr} = \sum_{S=1}^n \frac{S_{STr}}{n}$$

Step 3: Further aggregation (e.g., solution level)

$$S_L = \sum_{TR=1}^n \frac{S_{LTr}}{n}$$

Where:

S = score

E_f = elements with non – compliance

E_t = total number of tested elements

Subscript S, L og Tr = denote Page, Solution, and Test Criterion, respectively

All aggregations are based on the score per solution per test criterion. The most common aggregations are:

- **Aggregation per success criterion or principle** – takes the average of the compliance percentage per solution per test criterion for all test criteria that fall under each success criterion. This can be aggregated across solutions if desired.
- **Aggregation across multiple solutions** (e.g., for an industry group) – takes the average score for solutions to find an average score for all solutions.

Note When averaging the compliance percentage (aggregating), it is misleading to call it a percentage, as it's not possible to directly revert to the total number of compliant elements and the total number of tested elements for the solution. The score per page per test criterion is multiplied by 100 and presented as an integer.

10 ANNEX III – CALCULATION OF SAMPLE SIZE

In Norway the population was 5 571 634 as of the second quarter of 2024. This is used as the basis for the sample calculations.

10.1 Simplified monitoring

Simplified monitoring	Monitoring period	
	First and second	Third
Websites per 100 00 inhabitants	2	3
Minimum number of websites	75	75
Sample size simplified monitoring	186	242

10.2 In-depth monitoring (websites)

In-depth monitoring (websites)	Monitoring period	
	First and second	Third
Minimum 5% of simplified monitoring	9	12
Minimum number of websites	10	10
Sample size in-depth monitoring	19	22

10.3 In depth monitoring (apps)

In-depth monitoring (apps)	Monitoring period	
	First and second	Third
Number per million	1	1
Minimum number of apps	6	6
Sample size in-depth monitoring	12	12

11 ANNEX IV MAPPING OF ADMINISTRATION LEVEL

Level of administration	Classification of Institutional sector	Classification of Organization form
a	3100 - Norges Bank	Other body corporate
a	3900 - State lending institutions etc.	Other business enterprise in accordance with special legislation
a	3900 - State lending institutions etc.	Organisation section
a	6100 - Central government	Organisation section
a	6100 - Central government	State
b	6500 - Local government	County
c	6500 - Local government	Municipality
c	6500 - Local government	Organisation section
d	1520 - Public incorporated enterprises, owned by local government	Limited company
d	6500 - Local government	Limited company
d	1120 - Public incorporated enterprises, owned by central government	Limited company
d	6100 - Central government	Limited company
d	6500 - Local government	Other body corporate
d	6100 - Central government	Other body corporate
d	1110 - Public unincorporated enterprises owned by central government	Other business enterprise in accordance with special legislation
d	6100 - Central government	Other business enterprise in accordance with special legislation
d	6100 - Central government	General partnership with shared liability
d	6100 - Central government	Church of Norway
d	6500 - Local government	County municipal business enterprise
d	1510 - Public unincorporated enterprises, owned by local government	Inter-municipal company
d	6500 - Local government	Inter-municipal company
d	1510 - Public unincorporated enterprises, owned by local government	Municipal business enterprise
d	6500 - Local government	Municipal business enterprise
d	1110 - Public unincorporated enterprises owned by central government	Organisation section
d	1520 - Public incorporated enterprises, owned by local government	Co-operation
d	1120 - Public incorporated enterprises, owned by central government	Public corporation
d	6100 - Central government	Public corporation

d	6500 - Local government	Foundation
d	6100 - Central government	Foundation
d*	6500 - Local government	Church of Norway

a - state websites
b - regional websites
c - local websites
d - websites of bodies governed by public law not belonging to categories (a) to (c)
d* - websites of bodies governed by public law not belonging to categories (a) to (c) (churches and parishes)

12 ANNEX V – DETAILED RESULTS BY ENTITY (ANONYMOUS)

Id	Level of administration	Service	County	Score	Number of pages found	Number of non-compliance (elements)
1	a	P	Oslo	100,0	749	0
2	d	Q	Innlandet	100,0	55	0
3	d	O	Østfold	100,0	56	0
4	d	M	Innlandet	100,0	750	0
5	d	Q	Troms - Romsa - Tromssa	100,0	8	0
6	d	G	Trøndelag - Tröndelage	100,0	54	0
7	a	O	Agder	100,0	17	0
8	a	O	Oslo	100,0	12	0
9	d	O	Trøndelag - Tröndelage	100,0	46	0
10	a	O	Oslo	100,0	7	0
11	a	O	Oslo	100,0	8	0
12	a	O	Finnmark - Finnmarkku - Finmarkku	100,0	86	1
13	d	Q	Trøndelag - Tröndelage	100,0	91	1
14	c	O	Vestland	100,0	747	108
15	d	O	Agder	100,0	225	44
16	d*	S	Møre og Romsdal	100,0	58	5
17	d*	S	Østfold	100,0	41	7
18	d	O	Finnmark - Finnmarkku - Finmarkku	100,0	437	147
19	d	O	Møre og Romsdal	99,9	89	7
20	a	O	Oslo	99,9	747	45
21	d*	S	Vestfold	99,9	149	32
22	a	K	Oslo	99,9	747	165
23	c	O	Nordland - Nordlândia	99,9	597	505
24	a	P	Vestland	99,8	523	1560
25	a	O	Agder	99,7	741	5
26	a	O	Oslo	99,7	718	41
27	d	H	Oslo	99,7	475	644
28	a	O	Oslo	99,7	747	2014
29	c	O	Troms - Romsa - Tromssa	99,7	592	218
30	c	O	Vestfold	99,6	588	11
31	c	O	Akershus	99,6	750	10
32	a	O	Nordland - Nordlândia	99,6	747	88
33	a	O	Oslo	99,6	482	65
34	b	O	Møre og Romsdal	99,6	749	3
35	c	O	Rogaland	99,6	744	60
36	a	O	Oslo	99,5	750	533
37	d*	S	Agder	99,4	28	15
38	c	O	Trøndelag - Tröndelage	99,2	738	94
39	c	O	Buskerud	99,1	633	77
40	d	M	Agder	98,9	18	67

41	c	O	Finnmark - Finnmarkku - Finnmarkku	98,9	617	428
42	a	O	Nordland - Nordlândia	98,8	110	660
43	d	E	Trøndelag - Tröndelage	98,8	11	34
44	a	O	Østfold	98,8	23	31
45	c	O	Rogaland	98,7	617	20
46	d	R	Finnmark - Finnmarkku - Finnmarkku	98,5	490	14
47	a	O	Trøndelag - Tröndelage	98,0	459	809
48	d	J	Telemark	97,8	1	4
49	c	O	Nordland - Nordlândia	97,7	720	16
50	c	O	Trøndelag - Tröndelage	97,7	687	39
51	a	O	Oslo	97,7	363	413
52	c	O	Innlandet	97,7	652	17691
53	d	Q	Møre og Romsdal	97,7	748	11
54	d	Q	Innlandet	97,6	100	2671
55	c	O	Østfold	97,6	717	195
56	c	O	Akershus	97,2	686	29
57	c	O	Agder	97,2	622	652
58	a	P	Østfold	97,1	636	1527
59	b	O	Nordland - Nordlândia	97,1	652	127
60	a	O	Vestland	97,0	728	201
61	a	M	Vestland	97,0	726	1448
62	a	O	Akershus	96,9	675	164
63	c	O	Innlandet	96,5	368	1147
64	c	O	Agder	96,5	595	610
65	c	O	Agder	96,5	324	325
66	a	O	Trøndelag - Tröndelage	96,4	749	5862
67	c	O	Trøndelag - Tröndelage	96,4	328	21
68	a	P	Oslo	96,2	749	2716
69	c	O	Nordland - Nordlândia	96,1	590	655
70	a	P	Agder	96,0	703	129
71	a	P	Innlandet	95,9	365	9514
72	d	O	Oslo	95,7	424	590
73	c	O	Telemark	95,6	539	79
74	c	O	Vestland	95,4	663	102
75	c	O	Trøndelag - Tröndelage	95,4	605	57
76	c	O	Troms - Romsa - Tromssa	95,3	636	157
77	a	P	Møre og Romsdal	95,2	658	828
78	c	O	Troms - Romsa - Tromssa	95,1	750	764
79	c	O	Finnmark - Finnmarkku - Finnmarkku	95,1	708	1091
80	c	O	Vestland	95,0	537	550
81	d	Q	Vestland	95,0	52	2
82	c	O	Finnmark - Finnmarkku - Finnmarkku	95,0	750	170
83	d*	S	Vestland	94,9	416	6545
84	c	O	Trøndelag - Tröndelage	94,9	749	263
85	c	O	Akershus	94,8	454	21

86	c	O	Nordland - Nordlånnda	94,8	411	16
87	a	O	Oslo	94,8	638	4759
88	d	E	Rogaland	94,8	21	389
89	c	O	Trøndelag - Tröndelage	94,7	512	6
90	c	O	Østfold	94,7	749	110
91	c	O	Vestland	94,5	750	46
92	a	O	Oslo	94,4	750	735
93	c	O	Nordland - Nordlånnda	94,4	743	206
94	c	O	Østfold	94,3	739	749
95	d	G	Oslo	94,3	526	2095
96	d	Q	Nordland - Nordlånnda	94,2	749	40
97	a	M	Oslo	94,2	58	33
98	c	O	Møre og Romsdal	94,2	672	901
99	d	Q	Rogaland	94,1	749	29
100	c	O	Vestland	94,1	686	1764
101	d	D	Innlandet	94,0	31	18
102	c	O	Nordland - Nordlånnda	94,0	744	151
103	d	Q	Østfold	94,0	748	18
104	a	P	Nordland - Nordlånnda	94,0	489	1862
105	a	O	Oslo	93,9	750	1795
106	c	O	Troms - Romsa - Tromssa	93,9	666	794
107	d	E	Trøndelag - Tröndelage	93,9	194	3992
108	d	Q	Buskerud	93,8	711	17
109	a	O	Oslo	93,8	604	607
110	d	R	Troms - Romsa - Tromssa	93,7	379	695
111	c	O	Østfold	93,7	748	90
112	c	O	Nordland - Nordlånnda	93,7	514	101
113	b	O	Agder	93,6	750	26
114	d	Q	Rogaland	93,6	469	19
115	d	E	Vestland	93,6	161	595
116	d	H	Trøndelag - Tröndelage	93,5	325	641
117	c	O	Vestland	93,5	622	1729
118	c	O	Møre og Romsdal	93,4	665	681
119	c	O	Nordland - Nordlånnda	93,4	212	444
120	c	O	Vestland	93,4	523	41
121	a	O	Rogaland	93,3	750	1818
122	c	O	Trøndelag - Tröndelage	93,3	653	190
123	d	O	Agder	93,3	235	89
124	a	O	Østfold	93,1	249	2261
125	d	Q	Telemark	92,9	750	62
126	d	Q	Finnmark - Finnmarkku - Finmarkku	92,9	10	10
127	c	O	Buskerud	92,9	354	1416
128	d	D	Møre og Romsdal	92,7	14	55
129	d	O	Buskerud	92,6	66	77
130	d	O	Nordland - Nordlånnda	92,5	86	231

131	c	O	Vestland	92,5	344	65
132	d	R	Akershus	92,5	729	3087
133	d	R	Finnmark - Finnmarkku - Finmarkku	92,5	632	1724
134	c	O	Buskerud	92,5	748	974
135	c	O	Akershus	92,3	397	84
136	d	O	Akershus	92,2	112	68
137	d	R	Oslo	92,1	730	11099
138	d*	S	Rogaland	92,0	246	70
139	c	O	Vestland	92,0	393	611
140	a	O	Telemark	91,9	741	1038
141	c	O	Rogaland	91,9	748	1506
142	d	Q	Trøndelag - Tröndelage	91,7	28	1
143	d	M	Trøndelag - Tröndelage	91,7	559	3737
144	a	O	Vestland	91,7	586	3929
145	c	O	Innlandet	91,6	618	1945
146	c	O	Møre og Romsdal	91,6	733	764
147	d	O	Trøndelag - Tröndelage	91,5	325	33
148	c	O	Møre og Romsdal	91,4	750	292
149	a	O	Oslo	91,4	750	765
150	b	O	Østfold	91,2	635	18
151	d	H	Rogaland	91,2	269	21
152	a	R	Oslo	91,0	510	10950
153	d	Q	Nordland - Nordlännda	90,9	59	1
154	d	E	Vestland	90,9	73	115
155	d	R	Møre og Romsdal	90,8	472	1113
156	c	Q	Telemark	90,8	467	135
157	d	R	Nordland - Nordlännda	90,7	180	5253
158	a	K	Oslo	90,6	667	353
159	c	O	Agder	90,6	737	770
160	d	O	Innlandet	90,5	132	463
161	d	D	Buskerud	90,5	43	380
162	d	E	Rogaland	90,4	355	3671
163	c	O	Rogaland	90,4	746	647
164	c	O	Innlandet	90,4	701	463
165	a	F	Trøndelag - Tröndelage	90,4	750	1896
166	d	P	Nordland - Nordlännda	89,9	161	1895
167	c	O	Agder	89,9	561	642
168	d	Q	Buskerud	89,7	27	348
169	d	O	Troms - Romsa - Tromssa	89,6	29	303
170	c	O	Finnmark - Finnmarkku - Finmarkku	89,6	741	6043
171	a	O	Vestfold	89,2	749	3784
172	c	O	Finnmark - Finnmarkku - Finmarkku	89,2	687	279
173	d	E	Innlandet	89,1	151	2269
174	d	O	Rogaland	89,0	17	86
175	c	O	Buskerud	88,9	276	1106

176	d*	S	Akershus	88,8	174	1152
177	a	O	Vestfold	88,7	190	75
178	d	E	Finnmark - Finnmarkku - Finmarkku	88,6	29	101
179	a	P	Vestfold	88,5	749	59738
180	c	O	Buskerud	88,3	625	189
181	d	D	Telemark	88,2	55	510
182	c	O	Telemark	88,2	739	775
183	c	O	Troms - Romsa - Tromssa	88,1	750	1046
184	d	A	Trøndelag - Tröndelage	88,0	547	7611
185	d	O	Telemark	88,0	57	263
186	c	O	Vestland	87,9	699	1078
187	d	M	Akershus	87,9	31	320
188	c	O	Oslo	87,8	749	832
189	c	O	Telemark	87,7	676	120
190	c	O	Innlandet	87,7	715	338
191	d	E	Telemark	87,4	92	402
192	c	O	Innlandet	87,4	698	1011
193	d	Q	Troms - Romsa - Tromssa	87,4	12	26
194	c	O	Troms - Romsa - Tromssa	87,2	742	1067
195	a	O	Innlandet	87,2	742	8927
196	a	O	Oslo	87,2	658	526
197	c	O	Møre og Romsdal	86,7	750	526
198	d	R	Vestfold	86,7	156	7567
199	c	O	Innlandet	86,7	723	988
200	d	O	Vestland	86,7	70	17
201	a	M	Akershus	86,6	747	12592
202	a	O	Telemark	86,6	23	225
203	c	O	Rogaland	86,3	750	147
204	c	O	Trøndelag - Tröndelage	86,3	304	109
205	c	O	Nordland - Nordlånnda	86,1	659	1049
206	c	O	Møre og Romsdal	85,7	750	1064
207	a	O	Oslo	85,7	748	819
208	c	O	Trøndelag - Tröndelage	85,6	748	6741
209	a	P	Trøndelag - Tröndelage	85,5	719	11002
210	d	R	Nordland - Nordlånnda	85,4	749	16780
211	c	O	Innlandet	85,3	592	308
212	a	O	Oslo	85,3	747	16157
213	d	Q	Telemark	85,1	61	879
214	c	O	Telemark	84,9	227	416
215	d	O	Rogaland	84,9	125	424
216	d	D	Vestland	84,8	72	361
217	a	O	Vestland	84,7	400	6261
218	c	O	Møre og Romsdal	84,7	601	780
219	c	O	Telemark	84,6	749	93
220	a	M	Oslo	84,6	749	8423

221	c	O	Nordland - Nordlânnda	84,5	718	140
222	d	D	Vestland	84,5	62	1064
223	d	R	Innlandet	84,5	748	1046
224	d	O	Møre og Romsdal	84,4	18	182
225	d	O	Trøndelag - Trööndelage	84,0	134	644
226	d	E	Trøndelag - Trööndelage	83,9	549	330
227	d	R	Troms - Romsa - Tromssa	83,6	488	2506
228	d	O	Oslo	83,5	93	240
229	c	O	Innlandet	83,4	712	121
230	a	O	Oslo	83,3	750	2261
231	c	O	Innlandet	83,1	281	137
232	a	O	Oslo	82,8	721	5088
233	a	O	Oslo	82,5	693	37
234	c	O	Akershus	82,0	683	701
235	c	O	Rogaland	81,9	632	1377
236	d	L	Vestfold	81,8	262	1136
237	d	D	Østfold	81,5	65	605
238	d	E	Østfold	81,5	41	59
239	d	R	Agder	80,7	638	4898
240	d	E	Agder	80,6	13	44
241	d	N	Nordland - Nordlânnda	80,0	566	4888
242	c	O	Innlandet	80,0	499	900
243	d	O	Trøndelag - Trööndelage	79,8	313	608
244	c	O	Agder	79,7	602	836
245	d	E	Vestland	79,0	59	1133
246	d	R	Trøndelag - Trööndelage	78,6	63	306
247	d	M	Trøndelag - Trööndelage	78,0	16	76
248	d	H	Oslo	77,4	605	4545
249	c	O	Agder	76,0	332	997
250	d	N	Trøndelag - Trööndelage	75,9	747	5793
251	d	R	Vestland	75,1	748	2828
252	d	H	Nordland - Nordlânnda	75,0	108	279
253	d	M	Vestland	74,8	34	251
254	d	E	Nordland - Nordlânnda	69,8	295	3892
255	d	O	Rogaland	62,9	622	7939

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