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## CORRESPONDENCE FOLLOWING THE COMMITTEE MEETING

**Committee** POLICY REVIEW AND PERFORMANCE SCRUTINY COMMITTEE

**Date and Time of Meeting** TUESDAY, 16 MAY 2023, 4.30 PM

Please find below correspondence sent by the Committee Chair following the meeting, together with any responses received.

For any further details, please contact [scrutinyviewpoints@cardiff.gov.uk](mailto:scrutinyviewpoints@cardiff.gov.uk)

8 **Correspondence following committee meeting**(Pages 3 - 82)

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Date: 19 May 2023

Councillor Chris Weaver,  
Cabinet Member, Finance, Modernisation & Performance,  
Cardiff Council,  
County Hall,  
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Dear Chris,

### **PRAP Scrutiny Committee 16 May 2023: Workforce Strategy 2023/27**

Thank you for attending Committee on 16 May 2023 to present the Workforce Strategy 2023/27. Please also pass on my appreciation to the Chief Executive, Chris Lee and Tracey Thomas for presenting and answering Members questions at the meeting. The Committee and I particularly welcome your attendance in person.

Firstly, please be assured that the Committee notes the significant changes in working practices post pandemic, and the context the Council now faces in tackling the three key challenges of recruitment and retention, equalities and diversity, and hybrid working. I have been asked to pass on Members' comments, observations and recommendations as follows.

#### **Cultural values**

The Committee, in discussion with officers, clearly established that a focus of the Workforce Strategy is the need to review the organisation's cultural values. Members were pleased to hear that managers at Cardiff Council will be provided with guidance to manage their staff on the basis of outcomes rather than presence. We consider, in a time of constant change, that cultural values must be shared and understood by the whole organisation. Further, we must ensure our cultural values are at the heart of action planning to deliver the Workforce Strategy. We note the Chief Executive considers there is work to do in re-visiting organisational values, drawing out the value base for an employee charter with an emphasis on *open*, *fair* and *together*, and that this will require prioritising staff conversations and surveys to capture views about the current organisation.

The Committee concurs that the new model of working will require all managers to have a good grounding in organisational culture, understand the importance of their interactions with staff and that they are role models in action. We note your intention to develop a management competency framework that is linked to the cultural position, to reward on the basis of outcomes, and to constantly review the effectiveness of the framework.

### **Social Partnerships**

Members were pleased with your positive approach to social partnerships. In practice, we note that there are good relationships, both informal and formal monthly meetings. We are assured that the Council retains the option for robust discussion within appropriate boundaries understood by both sides, and that this is balanced, well-embedded and unlikely to change.

### **Building relationships face- to- face**

The Committee considers that there is a human element of public service which remains important. Whilst IT allows remote access for all management purposes, we urge that guidance encourages face-to-face engagement with staff, to ensure that a manager fully understands their member of staff. We are assured that such focussed engagement will be set out in Directorate Delivery Plans, with guidance creating the freedoms that suit both manager and member of staff.

### **Training**

Members were seeking assurance that the Council's frontline staff have been trained in the use of a trauma-informed approach. We are reassured that Occupational Health work closely with managers, particularly in areas such as Children's Services.

### **Neurodiversity**

Members were pleased to hear that HR guidance on managing neurodiverse conditions will be forthcoming. We are encouraged by the Council's focus on mental health conditions and its intention to develop on-line awareness training in a variety of neurodiverse conditions.

### **Consultation with staff**

The Committee recognises that the Workforce Strategy is a blueprint Council strategy, and Members were keen to establish what level of consultation with staff had informed its development. We note that you consulted with trade unions, employee networks and management fora prior to taking the strategy through Cabinet, and that you have recently communicated the strategy's content to all staff. However, as you convert the strategy into actions, we consider it will be important that you communicate and consult with *all* staff rather than representative groups. We are therefore **recommending** that you prioritise consultation with all staff.

### **HR skills base**

Members noted that the HR service performs a facilitating role, developing the guidance and tools to assist the Council's managers. We were therefore seeking assurance that the service has the right capacity and skills base to deliver appropriate support. We note there has recently been a restructure within the HR service, and newly appointed managers have brought new skills. We understand that management needs will differ across the organisation, and we were pleased to hear that, with the acquisition of additional resources, there are plans to analyse data already collected to better support managers.

### **Staff recruitment and retention through flexibility**

The Committee notes the importance of the Council being an employer of choice. We concur that staff engagement, health and well-being initiatives will make the Council more competitive given the organisation's limited flexibility on incentivisation. We urge that you fully embrace the need for flexibility. We support your aspiration to work constructively to retain staff by offering flexible retirement where there is physical need, and where the loss of expertise is a concern for the organisation. It is our view that the organisation will need to retain and attract older employees (65+). This is an issue we believe would benefit from conversations and consultation with staff. Similarly, we concur that the organisation must address the flexibility required for staff to move within and across the organisation to ensure personal career development. We note that where restructures are underway opportunities exist for increasing numbers of apprenticeships. We are therefore **recommending** a full review of how flexible the organisation is as an employer, paying particular attention to consulting all staff.

## Communicating competitively

Members established that the Council is currently operating in an extremely competitive marketplace, with high levels of job vacancies nationally, and public sector pay awards that do not match private sector awards. Officers are clearly concerned that the Council must communicate more competitively to tackle its recruitment and retention challenge. We note this is an area of potential improvement, given the many non-financial benefits that working in the public sector can offer. We note you are trying to make the process of applying for Council jobs easier and encouraging staff to talk about their experience of working for the Council.

## Recommendations following this scrutiny:

To summarise, the Committee makes 2 formal recommendations following this scrutiny, as set out below. As part of the response to this letter I would be grateful if you could, for each recommendation, state whether the recommendation is accepted, partially accepted or not accepted and summarise the Cabinet's response. If the recommendation is accepted or partially accepted, I would also be grateful if you could identify the responsible officer and provide an action date. This will ensure that progress can be monitored.

<b>Recommendation</b>	Accepted, Partially Accepted or Not Accepted	Cabinet Response	Responsible Officer	Action Date
<b>Staff Consultation</b> - As you convert the Workforce Strategy into action plans, that you prioritise consultation and engagement with <b>all</b> staff rather than representative groups, particularly when reviewing organisational values.				
<b>Review organisational flexibility</b> – that you undertake a full review of how flexible the organisation is as an employer in both working arrangements and career progression possibilities, paying particular attention to consulting <b>all</b> staff to inform any future changes.				

Finally, on behalf of the Committee, I thank you and the officers for bringing forward this important strategy for collaborative scrutiny. I look forward to your response.

Yours sincerely,



**COUNCILLOR JOEL WILLIAMS  
CHAIR, POLICY REVIEW AND PERFORMANCE SCRUTINY COMMITTEE**

cc Members of the Policy Review & Performance Scrutiny Committee;  
Leaders of Opposition Parties – Adrian Robson, Rodney Berman & Andrea Gibson  
Paul Orders, Chief Executive  
Chris Lee, Corporate Director Resources;  
Mr Gavin McArthur, Chair, Governance & Audit Committee.  
Chris Pyke, OM Governance & Audit.  
Tim Gordon, Head of Communications & External Relations.  
Jeremy Rhys, Assistant Head of Communications and External Affairs.  
Alison Taylor, Cabinet Support Officer  
Claire Deguara, Cabinet Business Manager;  
Andrea Redmond, Committees Support Officer.

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**Date:** 05/06/2023

Dear Councillor Williams,

Thank you for your letter of 19<sup>th</sup> May 2023, following our attendance at the committee on 16<sup>th</sup> May 2023 and your comments therein. The response to your recommendations is set out below.

<b>Recommendation</b>	Accepted, Partially Accepted or Not Accepted	Cabinet Response	Responsible Officer	Action Date
<b>Staff Consultation</b> - As you convert the Workforce Strategy into action plans, that you prioritise consultation and engagement with <b>all</b> staff rather than representative groups, particularly when reviewing organisational values.	Partially Accepted	Various consultation and engagement channels will be utilised as the action plan of the Strategy is implemented depending on the action itself. With regards to reviewing organisational values the aim will be to implement the widest engagement and consultation.	Tracey Thomas	31/03/24
<b>Review organisational flexibility</b> – that you undertake a full review of how flexible the organisation is as an employer in both	Partially accepted	As part of the workforce strategy action plan there is an action which looks at the resourcing strategies including career progression for services. It is expected that this will be different	Tracey Thomas	31/10/24

working arrangements and career progression possibilities, paying particular attention to consulting *all* staff to inform any future changes.

across individual services. The information will be sought from Directorates with the request that they seek information from across all areas and at all levels of their services.

Yours sincerely,

A handwritten signature in black ink on a yellow rectangular background. The signature appears to be 'C. Weaver' written in a cursive style.

**Councillor / Y Cynghorydd Chris Weaver**  
**Aelod Cabinet dros Gyllid, Moderneiddio a Pherfformiad**  
**Cabinet Member for Finance, Modernisation & Performance**

Date: 19 May 2023

Councillor Chris Weaver,  
Cabinet Member, Finance, Modernisation & Performance,  
Cardiff Council,  
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Dear Chris,

### **PRAP Scrutiny Committee 16 May 2023: Hybrid Working Policy**

On behalf of the Policy Review and Performance Scrutiny Committee thank you for attending Committee in person on 16 May 2023 to engage with the committee in policy development scrutiny of the Hybrid Working Policy. Please also pass on my appreciation to Chris Lee and Tracey Thomas for the presentation. Members note that the Council is facing a crisis in respect of recruitment and retention, and it is important that the option of hybrid working is attractive to existing and potential staff. Therefore, it is important to deliver a policy that addresses all aspects, to ensure it benefits both the staff and the organisation. Following the scrutiny, we offer our observations and recommendation on issues we consider it important that the policy addresses.

- **Multi-location working** – We consider staff should have the option of working from many locations, not simply from either home or office. We believe there should be an option to work from other council buildings and, longer-term, public service partner locations, where appropriate.
- **Employee choice** - We approve of the approach that no member of staff will be forced to work from home. We feel a member of staff should not have to disclose *why* they would prefer not to work from home, and we urge you to strengthen this point in the policy. Faced with a situation where a manager needs to insist the employee works either from home or office risks a toxic relationship between manager and staff.
- **Protecting managers** – We concur that it is important a manager knows their staff well, and has the same relationship with a member of staff whether on screen or in person. However, managing staff who are working from home involves walking a fine line between home and office life. We feel you will

need to explore what protections can be put in place for the Council's managers and ensure employee confidentiality.

- **Joy and inspiration** – Members wish to highlight that working from home risks a loss of the joy of collaborating with extrovert colleagues. Staff still need to be inspired by both their managers and colleagues. We fear a lack of human inspiration at work could become a retention issue.
- **Managing poor performance** - we consider it more difficult managing remotely where an employee is not performing well. The Hybrid Working Policy should include guidance for managers where this is the case.
- **Homeworking expenses** – Members feel most strongly that, with increasing costs of living, a member of staff should not be financially worse off because their post requires them to work from home. We believe the Council should have the flexibility to address this. We note you consider that the policy will evolve over time and staff can always revert to working from the office if it becomes too expensive to work from home. This would appear at odds with the Council's understanding of its core office accommodation needs. We were not satisfied with the Council's position as explained by officers at the meeting, that a reduction in the employees travel to work costs would offset their increasing costs of heating and lighting the home office to undertake their council work. We would like a more sophisticated response to this particular issue, this is not a good enough explanation in our view, and therefore we strongly **recommend** that you explore this issue further and tease out possibilities of financial support.
- **Staff living outside of the UK** – we are seeking assurance that protocols are in place to ensure the Council's security where employees are living abroad. We note there will still be a full recruitment process, and reassurance sought that the correct visa is in place for the prospective employee to work for a British organisation.
- **Multiple online meetings** – we suggest the policy addresses the demands of multiple back-to-back online meetings, including the need to build in breaks between meetings, given the potential impact on the employee's health and well-being.
- **Team working** – we caution against the risk of losing the benefits of team working and also the opportunity to build interdepartmental relationships.

- **Senior managers** – the policy must address the importance of senior managers communicating with all levels, not simply an employee’s line manager.
- **Employee’s right to privacy** - Members are uneasy about the suggestion that a manager should expect to see an individual on screen when working from home. The individual has a right to privacy in their own home and may have good reason they would prefer to have their camera off. We do, however, agree that a member of staff should be appropriately, if more casually, dressed for work when on screen.
- **Occupancy levels** - We feel that before you refine this policy you will need more accurate data as to the numbers of employees choosing to work from their core office (County Hall) each day. We assume that expert teams are working together on this policy, however we recommend you secure staff intent by consulting well ahead of finalising work styles. We **request** sight of any data currently held on the number of staff working from core office buildings that will be used to inform development of the Hybrid Working Policy.
- **Office-work boundaries** – we propose that the guidance covers the importance of a cut off time from work. We endorse the need for team cover throughout the day, but an employee should not be expected to be available longer than usual office hours. Team members should be prepared to share their working plans with managers so that office hours are covered.
- **Face-to-face benefits** – Members wholly support the concept of hybrid working, however wish to highlight that there are benefits of engagement beyond the screen, which must not be lost.

To summarise, in addition to the above observations, the Committee makes 1 request for further information and 1 formal recommendation following this scrutiny, as set out below. As part of the response to this letter I would be grateful if you could state whether the recommendation is accepted, partially accepted or not accepted and summarise the Cabinet’s response. If the recommendation is accepted or partially accepted, I would also be grateful if you could identify the responsible officer and provide an action date. This will ensure that progress can be monitored.

**Recommendation following this scrutiny:**

Recommendation	Accepted, Partially Accepted or Not Accepted	Cabinet Response	Responsible Officer	Action Date
That you provide a more sophisticated explanation of the Council's position in respect of reimbursement of the costs to the employee of working from home. We strongly recommend that you explore this issue further and tease out possibilities of financial support to ensure a member of staff is not financially worse off because their post requires them to perform a council service from home.				

**Request following this scrutiny:**

- That you provide the Committee with current data held on the occupancy levels of core office buildings that will be used to inform development of the Hybrid Working Policy.

Once again, on behalf of the Committee, I thank you and the officers for facilitating policy development scrutiny of an important issue for our staff, that can also improve the Council's recruitment and retention, whilst increasing equalities and diversity. I look forward to your response.

Yours sincerely,



**COUNCILLOR JOEL WILLIAMS  
CHAIR, POLICY REVIEW AND PERFORMANCE SCRUTINY COMMITTEE**

cc Members of the Policy Review & Performance Scrutiny Committee  
Leaders of Opposition Parties – Adrian Robson, Rodney Berman & Andrea Gibson  
Chris Lee, Corporate Director Resources  
Tracey Thomas, Chief HR Officer  
Gavin McArthur, Chair, Governance & Audit Committee  
Chris Pyke, OM Governance & Audit  
Gary Jones, Head of Democratic Services  
Tim Gordon, Head of Communications & External Relations  
Jeremy Rhys, Assistant Head of Communications and External Affairs  
Alison Taylor, Cabinet Support Officer  
Claire Deguara, Cabinet Business Manager  
Andrea Redmond, Committees Support Officer.

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**Date:** 05/06/2023

Dear Councillor Williams,

Thank you for your letter of 19<sup>th</sup> May 2023 following our attendance at the committee on 16<sup>th</sup> May 2023 and your comments therein. The response to your recommendations is set out below.

We are thankful to the Scrutiny Committee for setting out their observations and recommendations with regards to the development of the Hybrid Working Policy and these will be taken account of as the policy is progressed.

**Occupancy levels:**

Following the pandemic, the way in which core office buildings are utilised has

<b>Recommendation</b>	Accepted, Partially Accepted or Not Accepted	Cabinet Response	Responsible Officer	Action Date
That you provide a more sophisticated explanation of the Council's position in respect of reimbursement of the costs to the employee of working from home. We strongly recommend that you explore this issue further and tease out possibilities of financial support to ensure a member of staff is not financially worse off because their post requires them to perform a council service from home.	Partially Accepted	The recommendation is partially accepted in that the issue of any financial impact of working from home in comparison to commuting to work against the work life balance and preferences of employees will be considered as part of the policy development. However, as previously stated to Scrutiny, no member of staff will be forced to work from home so there will be no post that requires the employee to perform a Council service from home.	Tracey Thomas	31/12/12

changed, with predominant use centred around collaboration and meetings. A large

majority of core, office-based staff are completing focused work activity at home. Therefore, the current occupancy levels below are based largely on a largely remote working model.

The Facilities Management Team have completed a head count within all areas of County Hall and Willcox House every Wednesday since the Covid-19 pandemic began. To date, the occupancy count has not exceeded 450 at County Hall, with the week commencing 22<sup>nd</sup> May's count totalling 428. Occupancy at Willcox House has ranged from 9 to a maximum of 16, with the week commencing 22<sup>nd</sup> May's count totalling 9. These staff are required in relation to the ongoing operation of the ARC and will be relocating to County Hall in Autumn 2023. The core office occupancy at City Hall has ranged from 20 to approximately 70. This does not include occupancy relating to guests attending City Hall for events or training.

Following implementation of the interim accommodation changes, a count will be carried out more regularly to ensure space allocation to services is representative of their usage. Space allocation will be reviewed as service requirements change to meet service delivery needs and reallocation within overall utilised footprint will take place as required.

The office environment changes implemented as part of the next interim accommodation phase are based on an assessment of current occupancy levels and service requirements gathered and will help enable the organisation to move towards a hybrid model, but will be restricted due to core office building implications. This will be a holding position for the next few years while we move towards a revised core office accommodation strategy in line with the Hybrid Working model, which will increase occupancy figures in line with service delivery requirements.

Yours sincerely,

A handwritten signature in black ink on a yellow background, reading "C. Weaver".

**Councillor / Y Cynghorydd Chris Weaver**  
**Aelod Cabinet dros Gyllid, Moderneiddio a Pherfformiad**  
**Cabinet Member for Finance, Modernisation & Performance**

Date: 19 May 2023

Councillor Chris Weaver,  
Cabinet Member. Finance, Modernisation & Performance  
Cardiff Council,  
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Dear Chris,

### **Policy Review & Performance Scrutiny Committee: 16 May 2023**

Members of the Policy Review and Performance Scrutiny Committee have asked me to pass on their thanks for attending Committee to update us on the Customer and Digital Strategies. Members were pleased to welcome Isabelle Bignall, Chief Digital Officer and Head of Customer Services, Rachel Bishop. Please also pass on our appreciation to the Corporate Director Resources, Chris Lee. We offer the following comments, observations and requests, as discussed at the Way Forward.

#### **Request for training**

The Committee was particularly impressed with the Council's approach to Customer and Digital services, its aspiration for excellence, and also to help other local authorities on their digital journeys. We requested that you attend committee to familiarise ourselves with the service, but also to consider future possibilities for our work programme. Members have expressed an interest in an awareness raising visit to the frontline of customer services, C2C, incorporating a fuller understanding of how the Council might use AI. We **request** training and we would like our visit to cover:

- Digital awareness of what the Council offers.
- An understanding of Bobi the Council's chatbot.
- A better understanding of AI ChatGPT.
- How AI might assist the Council in responding to complaints.

#### **Accessibility**

Members were particularly keen to ensure that as the Council progresses the digital availability of services, it preserves accessibility for all. We pointed to examples of those who speak minority languages and those with sight loss. We note you work

within an established framework of ensuring inclusivity for all, and **request** that you share the accessibility report for the digital strategy, as offered at the meeting.

### **Sharing expertise**

The Committee has heard that services, such as Commissioning & Procurement, have arrangements with other local authorities to support them by sharing their expertise. We are keen to encourage this sharing of knowledge for Digital Services. We note that considerable work has been undertaken to ensure that Bobi, the Council's chatbot, is capable of effective delivery in the Welsh language, and that you have consequently secured shared intellectual property rights for this development. We applaud the initiative and urge the taking of commercial opportunities in sharing our expertise. We note that these are early days, and that recruitment and retention of software developers has become an issue. We **request** that you share the outcome of the WLGA/Wales Audit Office survey of digital services across all 22 Welsh local authorities.

### **Social media**

Members would like assurance that the personal data of Council customers who over share on social media platforms, such as Facebook and Twitter, is not stored. We recognise the value of Members having access to social media to gauge public feeling, particularly where they are sitting on committees such as the Planning Committee. However, we consider it important that someone has oversight of social media activity and monitors the appropriateness of media channels used to the request for service. For example, comments on planning matters should be directed to the Planning Portal.

### **Cyber security**

The Committee sought assurance that the Council has appropriate cover should it suffer a leak, given it is dealing with sensitive data. We were pleased to hear that there are robust processes in place for detecting cyber threats, and that there has recently been an external audit of our cyber security arrangements. We note that two weak links were identified, the risk of not retaining cyber security staff in the current employment market, and the risk of staff opening phishing links. We also note the Council performs its own phishing tests to evaluate this risk and there are 3 online cyber security training modules available.

**Requests following this scrutiny:**

- A committee visit to C2C with digital awareness training;
- Please share the accessibility report for the digital strategy;
- Please share the outcome of the WLGA/Wales Audit Office survey of digital services across all 22 Welsh local authorities.

Finally, on behalf of the Committee, thank you once again for this update. With your support, I look forward to continuing the valuable exchange between this Committee and the Cabinet. There are a number of requests following the scrutiny, and therefore I look forward to a response.

Yours sincerely,



**COUNCILLOR JOEL WILLIAMS  
CHAIR, POLICY REVIEW AND PERFORMANCE SCRUTINY COMMITTEE**

cc Members of the Policy Review & Performance Scrutiny Committee  
Leaders of Opposition Parties – Adrian Robson, Rodney Berman & Andrea Gibson  
Chris Lee, Corporate Director, Resources  
Isabelle Bignall, Chief Digital Officer  
Rachel Bishop, Head of Customer Service  
Mr Gavin McArthur, Chair, Governance & Audit Committee  
Chris Pyke, OM Governance & Audit  
Tim Gordon, Head of Communications & External Relations  
Jeremy Rhys, Assistant Head of Communications and External Affairs  
Gary Jones, Head of Democratic Services  
Alison Taylor, Cabinet Support Officer  
Claire Deguara, Cabinet Business Manager  
Andrea Redmond, Committees Support Officer.

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Date: 07/06/2023

Councillor Joel Williams  
Cardiff Council  
County Hall  
Cardiff  
CF10 4UW

Dear Councillor Williams,

## Policy Review & Performance Scrutiny Committee: 16 May 2023

Thank you for the opportunity to present to Committee, and for your letter dated 19<sup>th</sup> May. I welcome the opportunity to work cooperatively with this committee on continuing our aspiration for excellence regarding Customer and Digital Services and hope to see it feature in your work programme going forward.

In response to some of the specific points raised at Committee and subsequently in your letter, I hope that I have covered in the below items.

### Request for Training

I welcome the opportunity for members to attend an awareness raising visit to C2C, and will ensure we tailor the visit to cover:

- Digital awareness of what the Council offers.
- An understanding of Bobi the Council's chatbot.
- A better understanding of AI ChatGPT.
- How AI might assist the Council in responding to complaints.

### Accessibility

I note and agree the concerns around accessibility of digital services for all, and have attached a copy of the CDDO Report (Appendix 1) and the latest silktide report (Appendix 2) on Cardiff.gov.uk

### Sharing Expertise

I note and agree the importance of sharing expertise across other Local Authorities and will ensure the WLGA/Wales Audit Office report is shared with you when this is received (due to be published Sept 2023).

### Social Media

*Your information is processed under the Data Protection Act 2018 to fulfil Cardiff Council's legal and regulatory tasks as a local authority. For further information on what personal data we hold and how long we keep it for, please view our Privacy Policy; [www.cardiff.gov.uk/privacynotice](http://www.cardiff.gov.uk/privacynotice). If you have concerns about how your data has been handled, contact the Council's Data Protection Officer via [dataprotection@cardiff.gov.uk](mailto:dataprotection@cardiff.gov.uk). Your information has been shared with Xerox in order to contact you today. For further information on how Xerox manage personal data, please view Privacy Policy; [www.xerox.co.uk/en-gb/about/privacy-policy](http://www.xerox.co.uk/en-gb/about/privacy-policy)*

#### GWEITHIO DROS GAERDYDD, GWEITHIO DROSOCH CHI

Mae'r Cyngor yn croesawu gohebiaeth yn Gymraeg, Saesneg neu'n ddwyieithog. Byddwn yn cyfathrebu â chi yn ôl eich dewis, dim ond i chi roi gwybod i ni pa un sydd well gennych. Ni fydd gohebu yn Gymraeg yn arwain at oedi.

#### WORKING FOR CARDIFF, WORKING FOR YOU

The Council welcomes correspondence in Welsh, English or bilingually. We will ensure that we communicate with you in the language of your choice, as long as you let us know which you prefer. Corresponding in Welsh will not lead to delay.



In respect of the retention of information of users, as well as being stored on the social media channels natively and within the C2C CRM system on the occasions C2C staff have responded and/or reported an issue in which case the information is capture via private messaging, data is also held by Orlo, the software platform used by Cardiff Council to manage the social media channels. Therefore, Cardiff Council are the data processor for this and can (and have) request that Orlo delete the data. Members should be assured that when customers have shared personal info in a public space, the C2C social media team monitoring these posts will delete the public facing post or if on a platform where that is not possible, advise the customer to delete the information directly.

Understanding of public engagement with Cardiff Councils social media is fully available as the C2C social media team assign a 'tag' to all incoming messages which identifies the reason for the contact and allows a monitoring of themes and trends. This also provides an 'in the moment' oversight and awareness on channels. This activity reflects the operational hours of C2C with hours with alternate contact methods provided in the bios, any messages that require response that are sent outside of these times being picked up next working day. Colleagues in communications may monitor channels over weekend if they feel there is a need i.e. checking responses to an outgoing campaign that they expected to draw engagement for example.

Responses on Social Media platforms follow a set of guidelines;

- Signposting in the main and wherever possible to digital channels – ie relevant pages of council website/3<sup>rd</sup> party sites.
- Will be occasions where no digital route exists, and contact details are provided.
- Reports are logged on behalf of the citizen via C2C process/system.
- Common examples being; Council Tax more complex queries or confirming information seen by customer on digital channel.
- Chase up of previous requests made on digital/self-serve channels.
- Emergency/ad hoc issues such as Splashpad not working.

Specific protocols also exist for member queries made by Social Media which are passed on Member Services to process the query as they request, and an acknowledgement provided.

I hope the above gives you and the Committee Members more clarity on the information requested, and I would like to thank you for your comments.

Yours sincerely,

A handwritten signature in black ink on a yellow background, reading "C. Weaver".

**Councillor / Y Cynghorydd Chris Weaver**  
**Aelod Cabinet dros Gyllid, Moderneiddio a Pherfformiad**  
**Cabinet Member for Finance, Modernisation & Performance**



## Cardiff Council's Response to CDDO Accessibility Review April 2022

Please find within this document Cardiff Council's response to the CDDO's Accessibility report of our CardiffGov app dated 17 December 2021. We have responded to each issue within the context of the original report.

Every effort has been made to fix all issues identified in the report. Where fixes have been possible, our developers have implemented and released them. These can be re-tested on the latest version of the app available from App and Play store since 3 April 2022.

Here is a breakdown of the issues and fixes as they stand to date:

Issue status	Number of issues
Raised by CCDO report	57
Fixed and applied to live app	37
Partially fixed and in progress	1
Ongoing with set timeline for review	18
Defined as disproportionate burden	1

The issue referred to above as partially fixed is referenced on page 21 (Buttons). We aim to have fixed the remaining buttons in our next release. Apart from the bulky item search button which will need further investigation and we will review the position again by July 2022.

All issues that are ongoing are related to native controls or third-party software. Where this is the case we have referenced any known bugs or tickets raised with the suppliers.

On a few issues we refer to the Xamarin upgrade to Maui that we hope will provide further accessibility and opportunity for us to fix remaining issues. Maui becomes available later in 2022. Here is some more information about Maui and its development:

<https://devblogs.microsoft.com/dotnet/announcing-dotnet-maui-preview-11/>

As per CDDO requirements for this response, you will be able to view our updated accessibility statement from 11 April 2022 at [www.cardiff.gov.uk/appaccessibility](http://www.cardiff.gov.uk/appaccessibility)

To support our response please find at the end of this document:

- Appendix A – Orientation - Disproportionate burden assessment
- Appendix B – Overview of all issues and fix status

We will inform you of all releases that include further fixes and will update our statement appropriately.

Report compiled by Ruth Long – Implementation and Delivery Manager,  
Customer and Digital Services – Cardiff Council.

## WCAG 1.3.1 Info and relationships

<https://www.w3.org/WAI/WCAG21/Understanding/info-and-relationships.html>

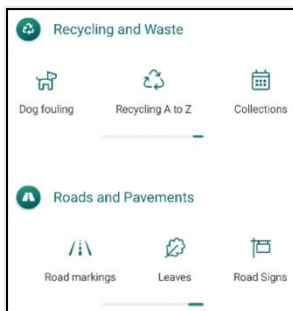
Information and relationships between content and elements that are made clear by visual formatting or audio cues should also be clear programmatically.

Assistive technologies such as screen readers rely on correct semantic use of elements to accurately interpret information for users. For example, text which visually looks like a heading because of bold styling should be marked up as such in the code.

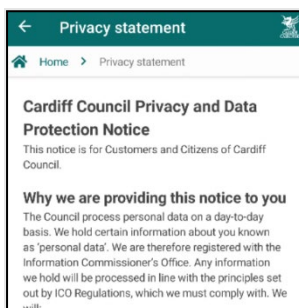
### Issue 1 – text that looks like a heading

In both the iOS and Android versions of the app there are several places where visually it looks like text should be a heading as it is stylistically different to the main text on the page and acts as a section heading.

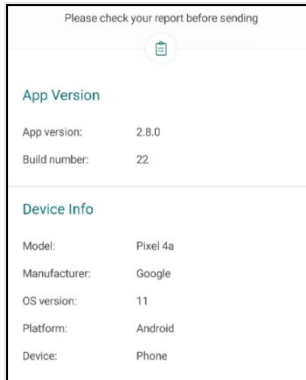
On the Home page, ‘Recycling and Waste’ and ‘Roads and Pavements’ look like section headings but are not coded as such. **This applies to both iOS and Android.**



On the Privacy statement page the bold text visually looks like headings. **This applies to both iOS and Android.**



The Report technical issue – Summary page also visually looks like it has section headings denoted by the large green text but are not programmatically headings. **This applies to both iOS and Android.**



## Cardiff Council's response to 1.3.1 Info and relationships – Issue 1 text that looks like a heading

### Image 1 and 3

Action taken: We have tried to use Xamarin Forms AutomationProperty.LabeledBy property but this doesn't work on iOS (mentioned in documentation <https://docs.microsoft.com/en-us/xamarin/xamarin-forms/app-fundamentals/accessibility/automation-properties>). No sign of Xamarin forms fixing this.

As an alternative we looked at Xamarin Community Toolkit's Semantic Effects - git hub bug raised (<https://github.com/xamarin/XamarinCommunityToolkit/issues/1543>)

Outcome: Cardiff Devs unable to fix due to third party bug.

Future plan: Xamarin to fix bug or upgrade their platform to Maui. Cardiff to update when Maui becomes available later in 2022. Preview stage available – not reliable enough to upgrade.

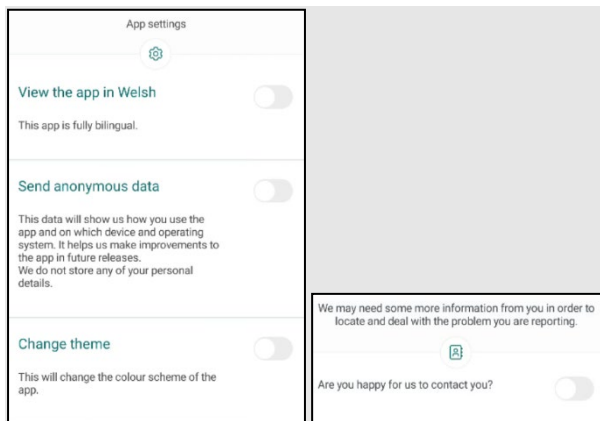
### Image 2

Fixed.

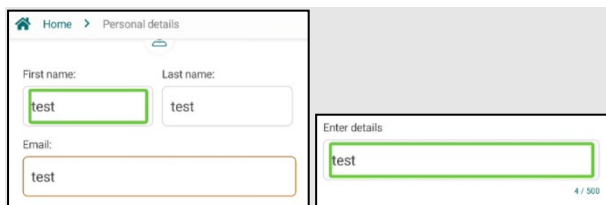
## Issue 2 – programmatically associated labels

There are places within the app where a screen reader does not always read out the visual label of a form field or control. The visual label of an item should be programmatically associated to the item.

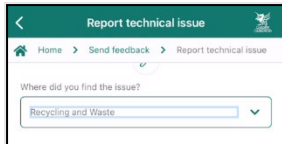
On the App Settings page there are switches that are not associated with the visible label. On Android the screen reader says “OFF, switch” or “ON, switch” only. On iOS it reads “Switch button, off” or “Switch button, on”. This issue also occurs on other pages with switches such as the Glass broken – Contact page where ‘Are you happy for us to contact you?’ has a switch. **This applies to both iOS and Android.**



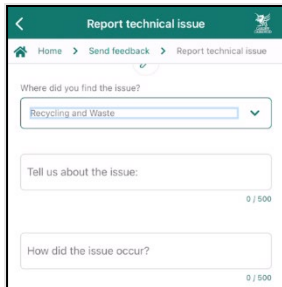
In many places on the app such as the Council Tax page, the Personal Details page, and when adding additional information when reporting an issue such as on the Glass broken – Additional information page, form fields are labelled with placeholder text. When entering information into these fields, a label appears above the form field to visually label it. This label does not appear to be programmatically associated with the form field. For example, if you write “test” into the field, the screen reader will say “test, Edit box” on Android or “test, text field” on iOS without reading the label too. This is an issue across most form fields except for the “Enter part of an address” fields. **This applies to both iOS and Android.**



On the Report technical issue page there is a drop down menu for ‘Where did you find the issue?’. When an option is selected, VoiceOver only reads the option you have selected rather than also reading the label for the element. **This applies to iOS only.**

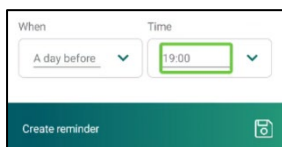


On the Report technical issue page, VoiceOver does not associate the placeholder text with two of the form fields. For example it will say 'Text field' only for 'Tell us about the issue' and for 'How did the issue occur?' **This applies to iOS only.**



On the Reminders page when you are setting up a reminder, there are also issues with labels not being programmatically associated:

- On iOS, neither of the drop down fields' labels are read out by VoiceOver for the 'Time' and 'When' fields. It will for example say "A day before, Button, Text field". **This applies to iOS only.**
- On Android the 'When' select field label is read out by TalkBack for example "A day before, Button, When" but this does not work for the 'Time' field which reads for example "19:00, Edit box". **This applies to Android only.**



## Cardiff Council's response to 1.3.1 Info and relationships – Issue 2 programmatically associated labels

### Image 1, 2, 3, 4 and 5

Action taken: We have tried to use Xamarin Forms AutomationProperty.LabeledBy property but this doesn't work on iOS (mentioned in documentation <https://docs.microsoft.com/en-us/xamarin/xamarin-forms/app-fundamentals/accessibility/automation-properties>). No sign of Xamarin forms fixing this.

As an alternative we looked at Xamarin Community Toolkit's Semantic Effects - git hub bug raised (<https://github.com/xamarin/XamarinCommunityToolkit/issues/1543>)

Outcome: Cardiff Devs unable to fix due to third party bug.

Future plan: Xamarin to fix bug or upgrade their platform to Maui. Cardiff to update when Maui becomes available later in 2022. Preview stage available – not reliable enough to upgrade.

## Issue 3 – text that looks like a list

On the Privacy statement page there are many parts of the text that have bullet points. Visually they look like unordered lists but do not appear to programmatically be lists. **This applies to both iOS and Android.**

### What personal data we hold, and how we obtain it

The types of personal data we hold and process about you can include:

- Contact details, including name, address, telephone numbers and email address.
- Identifying details, including date of birth, national insurance number and employee and membership numbers.
- Information that is used to calculate and assess eligibility for benefits.
- Financial information relevant to the calculation or payment of benefits, for example, bank account and tax details.
- Information about your family, dependents or personal circumstances, where required by a relevant service.
- Information about your health where required by a relevant service such as Social Services.
- Information about a criminal convictions where relevant.

Cardiff Council's response to 1.3.1 Info and relationships – Issue 3 text that looks like a list

Action taken: Fixed.

## Issue 4 – placeholder labels

On the Personal details page, and potentially on other pages with the same field, 'Enter part of an address' is labelled with placeholder text. This placeholder text disappears when you enter text into the field. TalkBack does read 'Enter part of an address' along with the field meaning there is a programmatic label, but there is no longer a visual label. **This applies to Android only.**

### Cardiff Council's response to 1.3.1 Info and relationships – Issue 4 placeholder labels

Action taken: We have tried to use Xamarin Forms AutomationProperty.LabeledBy property but this doesn't work on iOS (mentioned in documentation <https://docs.microsoft.com/en-us/xamarin/xamarin-forms/app-fundamentals/accessibility/automation-properties>). No sign of Xamarin forms fixing this.

As an alternative we looked at Xamarin Community Toolkit's Semantic Effects - git hub bug raised (<https://github.com/xamarin/XamarinCommunityToolkit/issues/1543>)

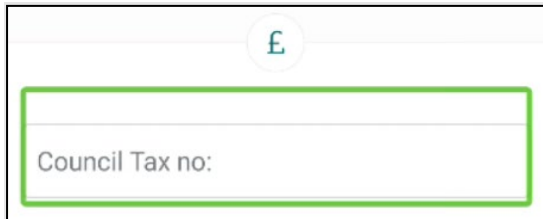
Outcome: Cardiff Devs unable to fix due to third party bug.

Future plan: Xamarin to fix bug or upgrade their platform to Maui. Cardiff to update when Maui becomes available later in 2022. Preview stage available – not reliable enough to upgrade.



## Issue 5 – visually hidden content

On the Council tax page, Talkback picks up on an element with the name 'EntryCtaxNumber' which is around the whole first input field. This label is visually hidden but is not hidden from screen reader users. **This applies to Android only.**



A screenshot of a web form element. At the top, there is a currency symbol (£) inside a light blue circle. Below it is a text input field with a light grey border. The text 'Council Tax no:' is visible inside the input field. A thick green rectangular border highlights the entire input field area.

Cardiff Council's response to 1.3.1 Info and relationships – Issue 5 visually hidden content

Action taken: Fixed

## WCAG 1.3.4 Orientation

<https://www.w3.org/WAI/WCAG21/Understanding/orientation.html>

A web page or application should not be locked to a horizontal or vertical view, unless it is essential. Limiting the display to a certain orientation can cause issues for users who cannot rotate their devices. Users should be able to view content in an orientation that works best for them.

### Issue 1 – whole app

Neither app can be changed from portrait to landscape orientation. **This applies to both iOS and Android.**

#### Cardiff Council's response to 1.3.4 Orientation – Issue 1 Orientation

Action taken: Devs unfixed portrait mode in test to review issues across app.

Outcome: Disproportionate burden.

Quick overview of issues on each OS:

Android - Map page doesn't work, reloads homepage if you try and rotate back to portrait. Maps are unusable in landscape and rest of page doesn't scroll - goes back to reloading homepage; camera reloads app; on fly tipping 'contact us' the keyboard conceals screen.

iOS - Rotates ok but maps unusable in landscape. Camera ok.

Rotating back to portrait is ok.

Map page won't scroll; map key overlaid on help; when typing additional info you cannot see what you are typing, on fly tipping 'contact us' the keyboard conceals screen.

Future plan: Development work on this would be extensive given that so much of the app is rendered unusable when the orientation is not fixed as portrait. The map, as a third-party application, would be beyond our remit so would remain unusable unless significant improvements were made by the supplier. Quite a few of the screens will need redesigning for landscape view and when we tested the app restarted every time the phone was rotated - not possible to give accurate timeline as not much information online about the issue.

Please see **Appendix A – Orientation - Disproportionate Burden Assessment**

## WCAG 1.4.3 Contrast (minimum)

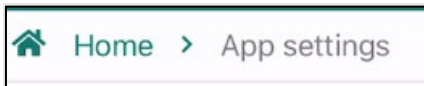
<https://www.w3.org/WAI/WCAG21/Understanding/contrast-minimum.html>

Poor colour contrast between text and its background makes it harder for all users to see content. The minimum contrast ratio is 4.5:1 for regular text and 3:1 for large text.

**This test was conducted using a colour picking tool to test the contrast of colours. These tools are sometimes inaccurate and therefore some of these issues may be false positives. Please let us know if the 'true' colours used in the application do meet the minimum contrast ratio.**

### Issue 1 – breadcrumbs

When navigating through the app, there are breadcrumbs that appear at the top of the page. The last item in this breadcrumb is grey text. The grey text on white does not have sufficient colour contrast. **This applies to both iOS and Android.**

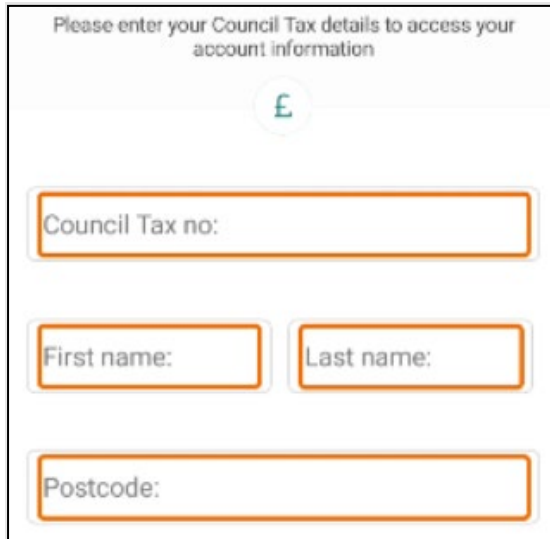


Cardiff Council's response to 1.4.3 Contrast (minimum) – Issue 1 breadcrumbs

Action taken: Fixed

## Issue 2 – placeholder text

Placeholder text is used throughout the apps in form fields and controls. The placeholders are grey text and do not have sufficient contrast against the white background. **This applies to both iOS and Android.**



Please enter your Council Tax details to access your account information

£

Council Tax no:

First name: Last name:

Postcode:

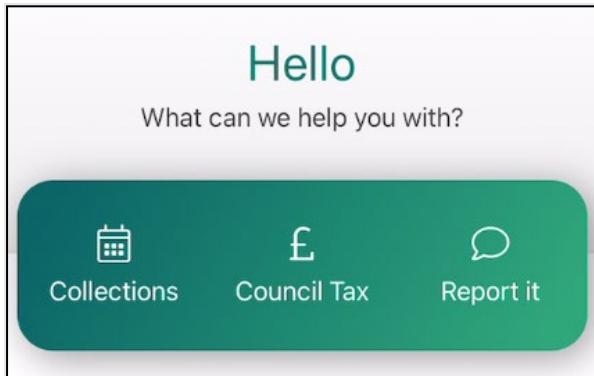
The screenshot shows a mobile application form with a white background and a thin grey border. At the top, there is a heading "Please enter your Council Tax details to access your account information" in a small, grey font. Below the heading is a green circular icon containing a white pound sign (£). The form contains four input fields, each with a grey placeholder text: "Council Tax no:" (a wide field), "First name:" (a narrow field), "Last name:" (a narrow field), and "Postcode:" (a wide field). All input fields have a thin orange border.

Cardiff Council's response to 1.4.3 Contrast (minimum) – Issue 2 placeholder text

Action taken: Fixed

## Issue 3 – button gradients

Throughout the app a gradient colour is used on buttons. When the white button label is long or is on the lightest part of this gradient it fails the minimum contrast requirement. For example the 'Report it' item on the Home page. This is likely to be more of an issue too when text is resized and made larger as more of the button labels will be pushed to the lighter end of the gradient. **This applies to both iOS and Android.**



Cardiff Council's response to 1.4.3 Contrast (minimum) – Issue 3 button gradients

Action taken: Fixed

## Issue 4 – link colour

On the Privacy statement page there are links. It does not appear these links have sufficient colour contrast. **This applies to both iOS and Android.**

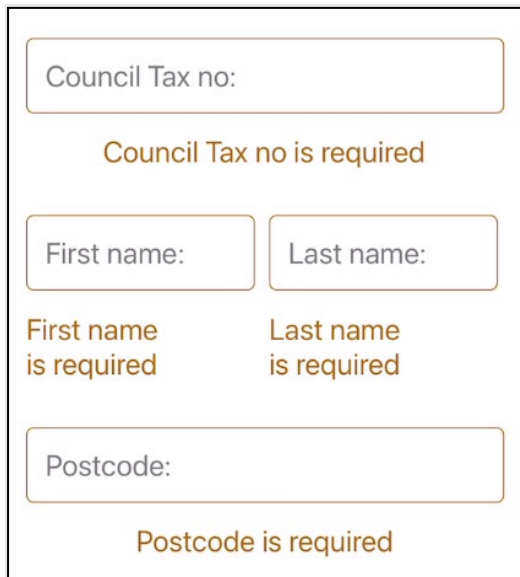
[dataprotection@cardiff.gov.uk](mailto:dataprotection@cardiff.gov.uk)

Cardiff Council's response to 1.4.3 Contrast (minimum) – Issue 4 link colour

Action taken: Fixed

## Issue 5 – error messages

The orange colour of the error messages used throughout the app do not meet the minimum contrast requirement against the white background. **This applies to both iOS and Android.**



Council Tax no:

Council Tax no is required

First name: Last name:

First name is required Last name is required

Postcode:

Postcode is required

Cardiff Council's response to 1.4.3 Contrast (minimum) – Issue 5 error messages

Action taken: Fixed

## Issue 6 – app information in the hamburger menu

In the hamburger menu accessed from the Home page there is text at the bottom that reads 'Cardiff Gov v.2.8.0'. This is grey text on a grey background and does not meet the minimum contrast requirement. **This applies to both iOS and Android.**



Cardiff Council's response to 1.4.3 Contrast (minimum) – Issue 6 app information in the hamburger menu

Action taken: Fixed



## WCAG 1.4.4 Resize text

<https://www.w3.org/WAI/WCAG21/Understanding/resize-text.html>

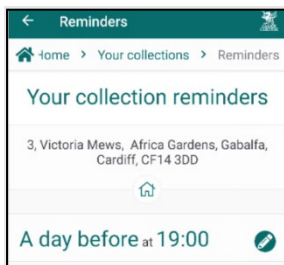
Visually impaired users may enlarge fonts or zoom in to make text easier to read. The web page should support increasing text size to 200 percent without losing content or functions.

### Issue 1 – text that does not resize

In the hamburger menu accessed from the Home page there is text at the bottom that reads 'Cardiff Gov v.2.8.0'. This text does not resize when the operating system settings are changed to large text. **This applies to both iOS and Android.**



On the Reminders page, the address that was chosen is shown. It does not appear this text gets larger when text size has been increased via the operating system settings. **This applies to Android only.**



### Cardiff Council's response to 1.4.4 Resize text – Issue 1 text that does not resize

#### Image 1

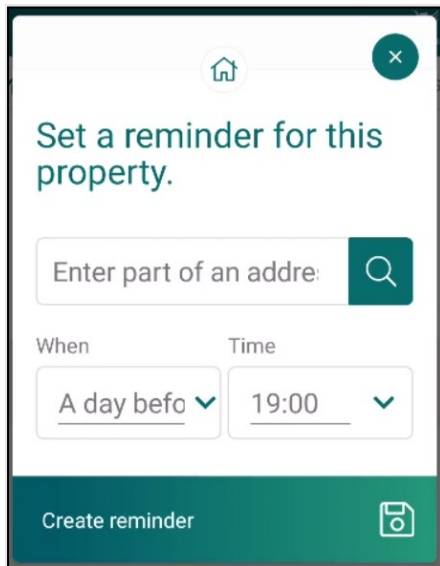
Action taken: Fixed

#### Image 2

Action taken: CDDO agreed to disregard as confirmed as previously fixed (meeting 02/03/2022)

## Issue 2 – partially cut off placeholder text

When text size is increased in the operating system, certain placeholder text is too large to fit in the field and is partially cut off. For example, this occurs on the Report it page with the 'What would you like to report' placeholder, and on the 'Enter part of an address' fields that appear on multiple pages such as the Glass broken – Where is the problem? page and the Reminders page. There is no other visible label that can be read instead for these fields. **This applies to Android only.**



Cardiff Council's response to 1.4.4 Resize text – Issue 2 partially cut off placeholder text

Action taken: Fixed

## WCAG 1.4.11 Non-text contrast

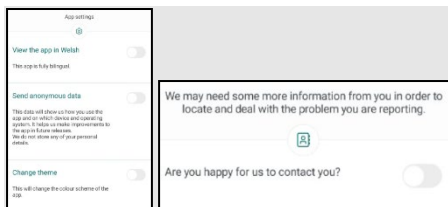
<https://www.w3.org/WAI/WCAG21/Understanding/non-text-contrast.html>

Meaningful graphics and non-text components need to have good contrast against their background to help users with low vision see them.

For example, on a selected radio button both its outline and its central dot must be easy to see compared to the other areas close to them, with a contrast ratio of at least 3:1.

### Issue 1 – switches

On the App settings page and the Glass broken – Contact page there are switches. When these are 'off' the grey colour of the switch does not have sufficient contrast against the white background. **This applies to both iOS and Android.**



### Cardiff Council's response to 1.4.11 Non-text contrast – Issue 1 switches

Action taken: Fixed

## WCAG 2.1.1 Keyboard

<https://www.w3.org/WAI/WCAG21/Understanding/keyboard.html>

Not everyone can use a mouse or touchscreen, so users must be able to access all content and functions using a keyboard.

### Issue 1 – Android keyboard functionality

Throughout the Android app, navigation via keyboard was very difficult. It was not possible to action almost all of the buttons on the pages via keyboard including switches, hamburger menu items and buttons in pop ups. The only items that could be used consistently via keyboard were text fields and the items in the 'header' (the back arrow and Cardiff logo). **This applies to Android only.**

#### Cardiff Council's response to 2.1.1 Keyboard – Issue 1 Android keyboard functionality

##### **Hamburger menu items**

Action taken: Fixed

##### **Pop-ups**

Action taken: Raised bug on GitHub re keyboard focus. Not able to set keyboard focus on pop up. Focus remains on screen behind pop up by default. No way to set focus on pop up content. <https://github.com/rotorgames/Rg.Plugins.Popup/issues/728>

Outcome: Cardiff Devs unable to fix due to third party bug.

Future plan: Third party to fix RG.plugins nuget. Or possibly nuget bug will be addressed in Maui upgrade. Cardiff to update when Maui becomes available later in 2022.

##### **Buttons**

Action taken: Majority of buttons are fixed and devs are continuing to work through others - bulky item search, collection reminders, recycling centre - select a time, missed collection status. Revisit July 2022 and review.

##### **Switches**

Action taken: Fixed

## Issue 2 – select options

On the Bags and caddies page you search for an address. When you press search, a list of addresses appears. It appears that you cannot reach any of the address options or the 'Cancel' button via keyboard. **This applies to Android only.**

### Cardiff Council's response to 2.1.1 Keyboard – Issue 2 select options

Action taken: Fragments.BottomSheetDialogFragment has no functionality for keyboard accessibility. This is an Android native feature. Devs would have to implement custom fix. Investigation carried out into several potential changes to third party solutions plus we have tried the newer approach of native Android popup, but that too has the same issue. Dev findings are that none of these would fix the bug.

Outcome: Project team have decided to leave this in anticipation of Android fix rather than custom code around it.

Future plan: Revisit July 2022 and review. Actively monitoring Android fix or update to third party solutions we have investigated.

## Issue 3 – links

On the Privacy statement page there are links in the text. There does not appear to be a way to reach the links via keyboard only. If you tap the screen first and then use a keyboard you can navigate to the links, but not via keyboard alone. **This applies to iOS only.**

### Cardiff Council's response to 2.1.1 Keyboard – Issue 3 links

Action taken: Devs continuing to work on fix.

Outcome: Not fixed currently.

Future plan: Continuing to investigate with a view to fixing in future release. Review July 2022.

## WCAG 2.2.2 Pause, stop, hide

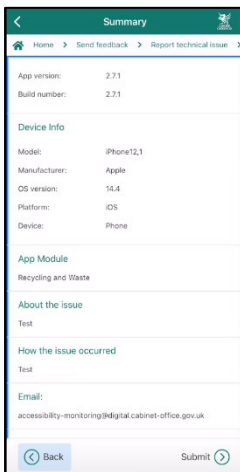
<https://www.w3.org/WAI/WCAG21/Understanding/pause-stop-hide.html>

Content that moves, flashes or updates automatically can be a severe distraction, making it difficult to use an app or web page.

Moving, flashing or scrolling information that starts automatically and lasts more than 5 seconds, must have a way to pause, stop or hide it.

### Issue 1 – scrolling animation

In many places on the app there are horizontal lines that are used to separate sections of the page. This line has an animation of a thin bar that moves across it every few seconds. There is no way to pause, stop or hide this. It appears on pages such as the Report it, Send feedback, and Report technical issue – Summary pages. **This applies to both iOS and Android.**

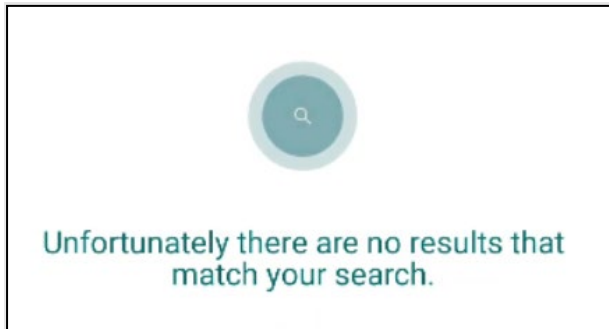


Cardiff Council's response to 2.2.2 Pause, stop, hide – Issue 1 scrolling animation

Action taken: Fixed

## Issue 2 – search animation

On the Report it page, when you enter a term into the search bar for which there are no results, a magnifying glass animation appears that plays continuously with no method to pause, stop or hide it. **This applies to both iOS and Android.**



Cardiff Council's response to 2.2.2 Pause, stop, hide – Issue 2 search animation

Action taken: Fixed



## WCAG 2.4.3 Focus order

<https://www.w3.org/WAI/WCAG21/Understanding/focus-order.html>

Users should be able to navigate a page in an order that makes sense. Navigating in a logical reading order reduces confusion and maintains relationships between content and components. The focus order may differ from the visual reading order as long as a user can still understand and use the page.

### Issue 1 – search

On the Report it page, when you have entered a term into the search field and try to tab to the magnifying glass icon, keyboard focus disappears. If you continue tabbing, focus reappears at the top of the screen rather than moving through the page as expected. **This applies to Android only.**

#### Cardiff Council's response to 2.4.3 Focus order – Issue 1 search

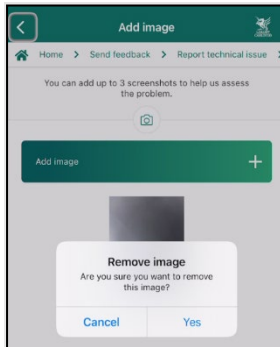
Action taken: Thorough investigation by Devs. No bugs raised.

Outcome: Unable to fix.

Future plan: Continue to investigate. Possible improvement with Maui upgrade later in 2022.

## Issue 2 – adding an image

When adding an image on the Report technical issue – add image page the image is uploaded on the screen. When you press on this image using a keyboard the options to remove the image pop up. When this happens, focus moves to the top of the screen to the '<' icon rather than to the pop up window that has appeared. **This applies to iOS only.**



### Cardiff Council's response to 2.4.3 Focus order – Issue 2 adding an image

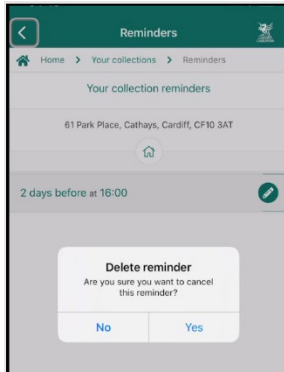
Action taken: Native iOS issue. Devs would have to implement custom fix.  
We use we use iOS's UIAlertController -  
<https://developer.apple.com/documentation/uikit/uialertcontroller>

Outcome: Project team have decided to leave this in anticipation of iOS fix rather than custom code around it.

Future plan: Revisit July 2022 and review. Actively monitoring iOS fix.

## Issue 3 – deleting a reminder

On the Reminders page, when you want to delete a reminder, you can select 'Delete' and a pop up appears asking if you are sure you want to cancel the reminder. When this appears, focus moves back to the top of the page to the '<' icon rather than to the pop up window that has appeared. **This applies to iOS only.**



### Cardiff Council's response to 2.4.3 Focus order – Issue 3 deleting a reminder

Action taken: Native iOS control issue. Devs would have to implement custom fix. We use we use iOS's UIAlertController - <https://developer.apple.com/documentation/uikit/uialertcontroller>

Outcome: Project team have decided to leave this in anticipation of iOS fix rather than custom code around it.

Future plan: Revisit July 2022 and review. Actively monitoring iOS fix.

## Issue 4 – map

On the Pick up bags or caddy liners – map page, keyboard focus moves through the page behind the map before moving to the map. It would be expected that the new content, the map, would receive focus when it was activated. **This applies to Android only.**

Cardiff Council's response to 2.4.3 Focus order – Issue 4 map

Action taken: Fixed

## Issue 5 – selecting options

On the Report technical issue page when you select the 'Where did you find the issue?' field, the options open at the bottom of the screen. Using a keyboard, you have to tab through the rest of the form before focus moves to these options and allows you to select one. **This applies to iOS only.**

Report technical issue

Home > Send feedback > Report technical issue

Where did you find the issue?

Recycling and Waste

Tell us about the issue: 0 / 500

How did the issue occur? 0 / 500

Email:

If you are under 16 you will need your parent or guardian's permission before providing your email address.

Done

Report an issue

Recycling and Waste

Roads and Pavements

Council Tax

### Cardiff Council's response to 2.4.3 Focus order – Issue 5 selecting options

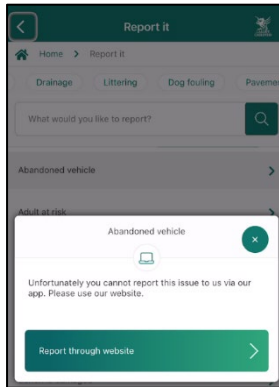
Action taken: Native iOS control issue. Devs would have to implement custom fix.

Outcome: Project team have decided to leave this in anticipation of iOS fix rather than custom code around it.

Future plan: Revisit July 2022 and review. Actively monitoring iOS fix.

## Issue 6 – not available to report pop up

On the Report it page, when you choose an option that is not available to report via the app a pop up appears to tell you this. When the pop up appears, focus moves back to the top of the page to the '<' icon whereas it would be expected that focus would be on the new content in the pop up. **This applies to both iOS and Android.**



### Cardiff Council's response to 2.4.3 Focus order – Issue 6 not available to report on app

Action taken: Raised bug on GitHub re keyboard focus. Not able to set keyboard focus on pop up. Focus remains on screen behind pop up by default. No way to set focus on pop up content. <https://github.com/rotorgames/Rg.Plugins.Popup/issues/728>

Outcome: Cardiff Devs unable to fix due to third party bug.

Future plan: Third party to fix RG.plugins nuget. Or possibly nuget bug will be addressed in Maui upgrade. Cardiff to update when Maui becomes available later in 2022.

## WCAG 2.4.4 Link purpose (in context)

<https://www.w3.org/WAI/WCAG21/Understanding/link-purpose-in-context.html>

The purpose of each link must be clear from the link text alone or from its immediate context. Users may tab through a set of links on a page, or may view a list of links using assistive technology. Clear link text makes navigation easier.

### Issue 1 – privacy statement

In the Privacy statement there is a link which is the email address for the Data Protection Officer. This link appears to be in a separate paragraph. Visually, the link has context as there is bold text above that says 'Data Protection Officer' and looks like a heading, but this visual context is not available for screen reader users. **This applies to both iOS and Android.**



Cardiff Council's response to 2.4.4 Link purpose – Issue 1 privacy statement

Action taken: Fixed

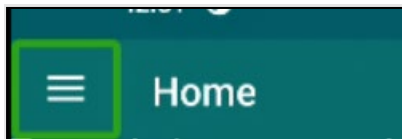
## WCAG 2.4.6 Headings and labels

<https://www.w3.org/WAI/WCAG21/Understanding/headings-and-labels.html>

Clear and descriptive headings and labels help users understand content more easily.

### Issue 1 – hamburger menu

On the Home page the hamburger menu icon is read out by TalkBack as 'Ok'. This is not descriptive of the button. **This applies to Android only.**



#### Cardiff Council's response to 2.4.6 Headings and labels – Issue 1 hamburger menu

Action taken: GitHub ticket raised for bug in Xamarin.

Outcome: Cardiff Devs unable to fix due to third party bug.

Future plan: Xamarin to fix bug or upgrade their platform to Maui. Cardiff to update when Maui becomes available later in 2022. Preview stage available – not reliable enough to upgrade.



## WCAG 2.4.7 Focus visible

<https://www.w3.org/WAI/WCAG21/Understanding/focus-visible.html>

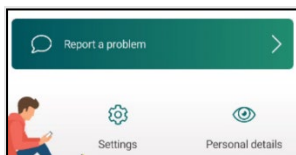
All interactive elements must have a visible indicator when focussed using a keyboard. This helps users to identify which parts of a web page or app they can interact with, and shows their place as they navigate.

Operating systems have a set focus style which is often carried through to browsers and apps. This default focus indicator can sometimes be difficult to see on different coloured backgrounds.

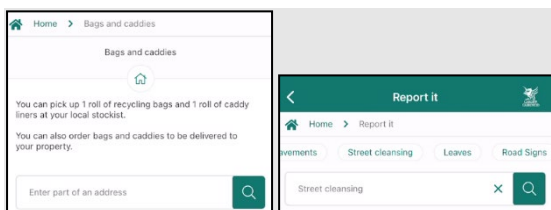
### Issue 1 – buttons

Throughout the app there are places where there is no visible focus or barely visible focus on buttons.

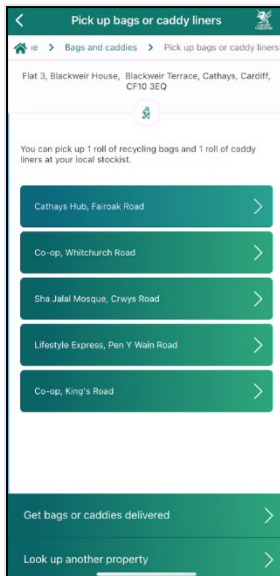
On the Home page there is no visible focus on the ‘Report a problem’ button on iOS and barely visible focus on Android. **This applies to both iOS and Android.**



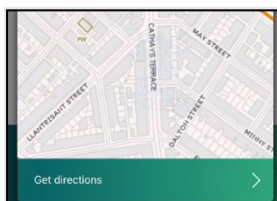
On the Bags and caddies page, and the Report it page there is no visible focus on the magnifying glass icon in the search field on iOS and barely visible focus on Android. **This applies to both iOS and Android.**



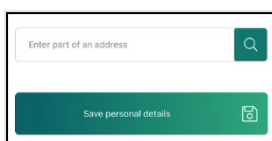
On the Pick up bags or caddy liners page the first button for local stockists receives visible focus, but the subsequent buttons do not. Neither does the ‘Look up another property’ button. **This applies to iOS only.**



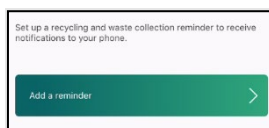
On the Pick up bags of caddy liners – map page there is no visible focus on the ‘Get directions’ button. **This applies to iOS only.**



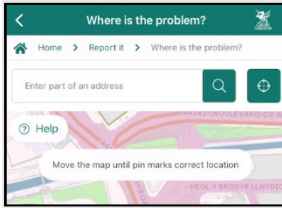
On the personal details page there is no visible keyboard focus on the magnifying glass icon or on the ‘Save personal details’ button on iOS. On Android there is barely visible focus on the ‘Save personal details’ button and no visible focus on the magnifying glass icon. **This applies to both iOS and Android.**



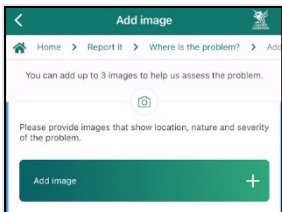
On the Reminders page there is no visible keyboard focus on the ‘Add a reminder’ button. **This applies to iOS only.**



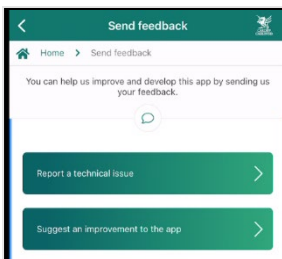
On the Glass broken – Where is the problem? page there is no visible focus on the magnifying glass icon or the target icon on iOS. On Android the focus is barely visible. **This applies to both iOS and Android.**



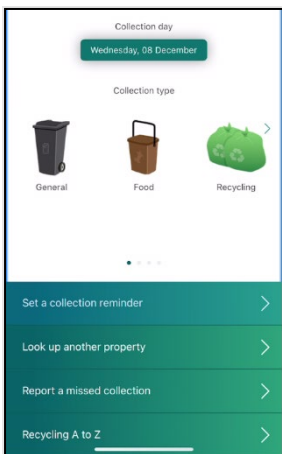
On the Glass broken – Add image page there is no visible keyboard focus on the ‘Add image’ button. **This applies to iOS only.**



On the Send feedback page there is no visible keyboard focus on the ‘Report a technical issue’ and ‘Suggest an improvement to the app’ buttons. **This applies to iOS only.**



On the Collections calendar page there is no visible focus on the ‘Look up another property’, ‘Report a missed collection’ or the ‘Recycling A-Z’ buttons. **This applies to iOS only.**



Cardiff Council's response to 2.4.7 Focus visible – Issue 1 buttons

**Image 1:** iOS Fixed. Android passed (barely visible)

**Image 2:** iOS Fixed. Android passed (barely visible)

**Image 3:** Fixed

**Image 4:** Fixed

**Image 5:** iOS Fixed. Android passed (barely visible)

**Image 6:** Fixed

**Image 7:** iOS Fixed. Android passed (barely visible)

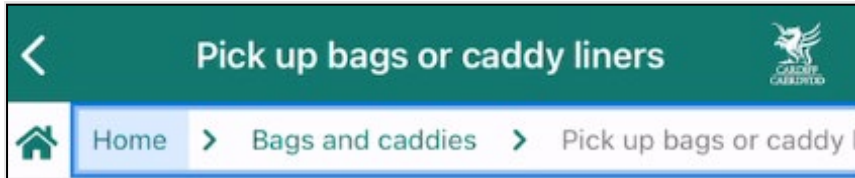
**Image 8:** Fixed

**Image 9:** Fixed

**Image 10:** Fixed

## Issue 2 – breadcrumbs

Across the app there is no visible keyboard focus on the breadcrumb items after the initial 'Home' breadcrumb. For example, on the Pick up bags or caddy liners page there is no visible keyboard focus on the second item 'Bags and caddies'. **This applies to iOS only.**



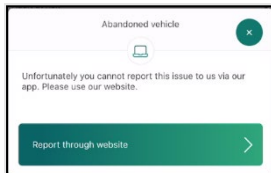
Cardiff Council's response to 2.4.7 Focus visible – Issue 2 breadcrumbs

Action taken: Fixed

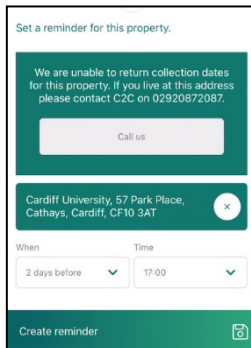
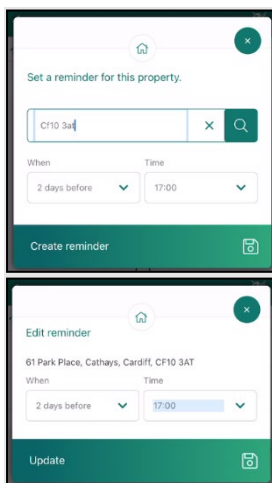
### Issue 3 – pop ups

There are several instances within the app where pop ups appear and keyboard focus is not visible.

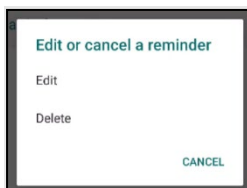
On the Report it page, when you choose an item that is not available to report via the app such as ‘abandoned vehicle’ a pop up appears. There is no visible focus on the ‘Report through website’ button. **This applies to iOS only.**



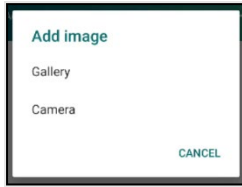
On the Reminders page there is no visible keyboard focus on the magnifying glass icon or the ‘Create reminder’ button when you are creating a reminder. When you have searched for an address, there is then no visible focus on the ‘X’ icon either. If you choose an address that does not have any collection dates there is then no visible focus on the ‘Call us’ button. Additionally, when you are editing a reminder that you have already set, there is no visible keyboard focus on the ‘Update’ button. **This applies to iOS only.**



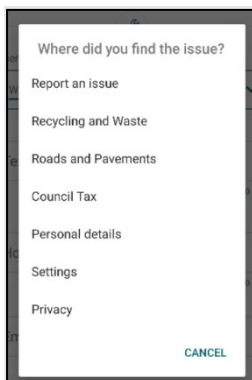
On the Reminders page when you click on a reminder that you have already set you get the option to ‘Edit’ or ‘Delete’ the reminder. These options do not receive visible focus. **This applies to Android only.**



On the Glass broken – add image page and on the Report technical issue – add image page a pop up appears when you press the button to add an image. This pop up is actionable via keyboard but there is no visible focus on the ‘Gallery’ or ‘Camera’ options. **This applies to Android only.**



On the Report technical issue page the items in the select menu under ‘Where did you find the issue?’ are actionable via keyboard but do not receive visible focus. **This applies to Android only.**



## Cardiff Council’s response to 2.4.7 Focus visible – Issue 3 pop ups

### Image 1

Action taken: Raised bug on GitHub re keyboard focus. Not able to set keyboard focus on pop up. Focus remains on screen behind pop up by default. No way to set focus on pop up content. <https://github.com/rotorgames/Rg.Plugins.Popup/issues/728>

Outcome: Cardiff Devs unable to fix due to third party bug.

Future plan: Third party to fix RG.plugins nuget. Or possibly nuget bug will be addressed in Maui upgrade. Cardiff to update when Maui becomes available later in 2022.

### Image 2: Fixed

### Image 3, 4 and 5

Action taken: Fragments.BottomSheetDialogFragment has no functionality for keyboard accessibility. This is an Android native feature. Devs would have to implement custom fix. Investigation carried out into several potential changes to third party solutions. Dev findings are that none of these would fix the bug.

Outcome: Project team have decided to leave this in anticipation of Android fix rather than custom code around it.

Future plan: Revisit July 2022 and review. Actively monitoring Android fix or update to third party solutions we have investigated.



## WCAG 2.5.2 Pointer cancellation

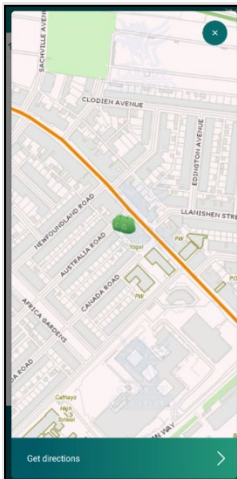
<https://www.w3.org/WAI/WCAG21/Understanding/pointer-cancellation.html>

To stop users accidentally triggering the wrong action, no action should be completed at the moment of clicking or tapping “down” on an element such as a button. Instead, actions should be completed on the “up” event, when contact is released, and there should be a way to cancel the action, for example, by moving away from the button while it is still pressed.

This helps users with visual disabilities, cognitive limitations, and motor impairments by reducing the impact of accidentally hitting the wrong control.

### Issue 1 – map

On the Pick up bags or caddy liners – map page there is no way to move away from the ‘X’ and ‘Get directions’ buttons to cancel the down event. **This applies to Android only.**

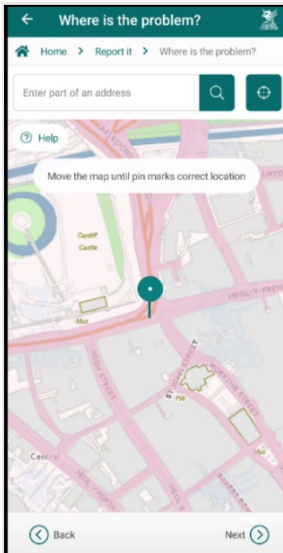


Cardiff Council's response to 2.5.2 Pointer cancellation – Issue 1 map

Action taken: Fixed

## Issue 2 – selecting location

On the Glass broken – Where is the problem? page there is no way to move away from the magnifying glass icon, the target icon, or the 'Back', 'Next' or 'Help' buttons to cancel the down event. **This applies to Android only.**



Cardiff Council's response to 2.5.2 Pointer cancellation – Issue 2 selecting location

Action taken: Fixed

## WCAG 3.2.1 On focus

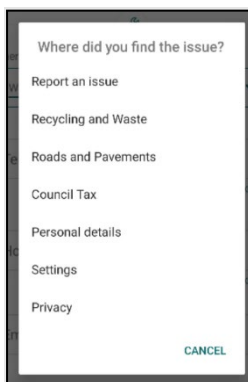
<https://www.w3.org/WAI/WCAG21/Understanding/on-focus.html>

The functions of a page should be easy to notice as a user navigates it. There must not be any unexpected changes on a page when a user focuses on an interactive component such as a button. This helps users with visual, cognitive and motor impairments.

### Issue 1 – select menus

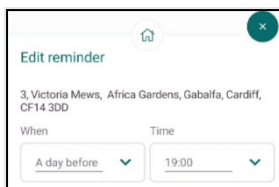
There are two instances where select menus automatically open on focus.

On the Report technical issue page when keyboard focus moves to the 'Where did you find the issue' option it automatically opens the drop down menu. Once you select an item and try to tab past it, it selects the field again effectively creating a keyboard trap and making it difficult to be able to navigate to other parts of this page.  
**This applies to Android only.**



On the Reminders page, when editing a reminder or setting a new one, moving keyboard focus to the 'When' drop down field or to the 'Time' drop down automatically actions the field. As such it is difficult to discern whether it is possible to access the 'Update' or 'Create reminder' buttons via keyboard because it is difficult to navigate to them.

**This applies to Android only.**



## Cardiff Council's response to 3.2.1 On focus – Issue 1 select menus

### **Image 1 and 2**

Action taken: Investigation and attempted fixes.

Outcome: Cardiff Devs unable to fix due to third party bug.

Future plan: Xamarin to fix bug or upgrade their platform to Maui. Cardiff to update when Maui becomes available later in 2022. Preview stage available – not reliable enough to upgrade.

## WCAG 3.2.2 On input

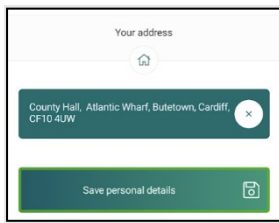
<https://www.w3.org/WAI/WCAG21/Understanding/on-input.html>

The functionality of a page should be predictable as a user inputs data. Any component must not cause a disorienting change when it gets input, unless the user is warned about the change first. This helps users with visual, cognitive and motor impairments.

### Issue 1 – addresses

On the Personal details page, and potentially other pages with an 'Enter part of an address' field, searching for a postcode usually provides the opportunity to select an address. However, when you search a postcode where there is only one address in that postcode for example CF10 4UW (County Hall) the address is automatically populated and focus moves on to the 'Clear address' button (the 'X'). There is no notification to a screen reader user that the address has been input automatically.

**This applies to Android only.**



### Cardiff Council's response to 3.2.2 On input – Issue 1 addresses

Action taken: Fixed

## WCAG 3.3.3 Error suggestion

<https://www.w3.org/WAI/WCAG21/Understanding/error-suggestion.html>

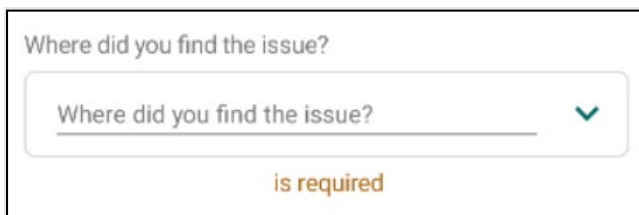
When a form detects an error, users should get information on how to correct it. For example, a user should be advised if they need to enter data into a required field, or to enter a date in a certain format.

This makes it easier for users with disabilities to submit the form successfully.

The main exception is where suggestions would be a security risk - for example, confirming if a username exists or not.

### Issue 1 – non-descriptive error message

On the Report technical issue page the error message on the first field says 'is required' without telling the user which field it is referring to. **This applies to both iOS and Android.**



The screenshot shows a form field with the label "Where did you find the issue?". The field contains the text "Where did you find the issue?" and a green checkmark icon. Below the field, the text "is required" is displayed in orange, indicating an error message.

Cardiff Council's response to 3.3.3 Error suggestion – Issue 1 non-descriptive error message

Action taken: Fixed

## WCAG 4.1.2 Name, role, value

<https://www.w3.org/WAI/WCAG21/Understanding/name-role-value.html>

Assistive technologies gather information about interactive elements and components from the code and share it with users. This means they need to be able to identify the name and function of components, set states, properties and values, and notify users of changes to these.

[ARIA attributes](#) may be used on custom components to add this information. ARIA attributes should be used correctly as errors can make accessibility worse.

## Issue 1 – links on Android

On the Privacy Statement and Accessibility statement pages there are links that cannot be accessed using TalkBack. These links seem to work via touch, but TalkBack does not appear to recognise them as links or actionable elements. **This applies to Android only.**

[www.ico.org.uk](http://www.ico.org.uk) or via their telephone helpline 0303 123 1113.

### Accessibility Statement

This mobile application is partially compliant with the Web Content Accessibility Guidelines version 2.1 AA standard.

For full details on our Cardiff Gov App accessibility please go to [www.cardiff.gov.uk/appaccessibility](http://www.cardiff.gov.uk/appaccessibility)

Cardiff Council's response to 4.1.2 Name, role, value – Issue 1 links on Android

Action taken: Fixed

## Issue 2 – links on iOS

On the Privacy statement page, the links relating to the Commissioner's Office appear to be embedded in the same block element. They are actionable individually via keyboard and touch navigation but when you try to action them using VoiceOver it only actions entire block, opening the first link to the webpage. There does not appear to be a way to action the phone number link using VoiceOver. **This applies to iOS only.**

Commissioner's Office at: [www.ico.org.uk](http://www.ico.org.uk) or via their telephone helpline [0303 123 1113](tel:03031231113).

Cardiff Council's response to 4.1.2 Name, role, value – Issue 2 links on iOS

Action taken: Fixed



## Issue 3 – placeholder text

In places where there is an 'Enter part of an address' field such as on the Glass broken – Where is the problem? page and the Bags and caddies page, and also the search field on the Report it page, the label for the fields are placeholder text. Once you have entered text, the placeholder disappears meaning there is no longer a visible label on this field and VoiceOver does not read out a programmatic label either. **This applies to iOS only.**

### Cardiff Council's response to 4.1.2 Name, role, value – Issue 3 placeholder text

Action taken: Action taken: We have tried to use Xamarin Forms AutomationProperty.LabeledBy property but this doesn't work on iOS (mentioned in documentation <https://docs.microsoft.com/en-us/xamarin/xamarin-forms/app-fundamentals/accessibility/automation-properties>). No sign of Xamarin forms fixing this.

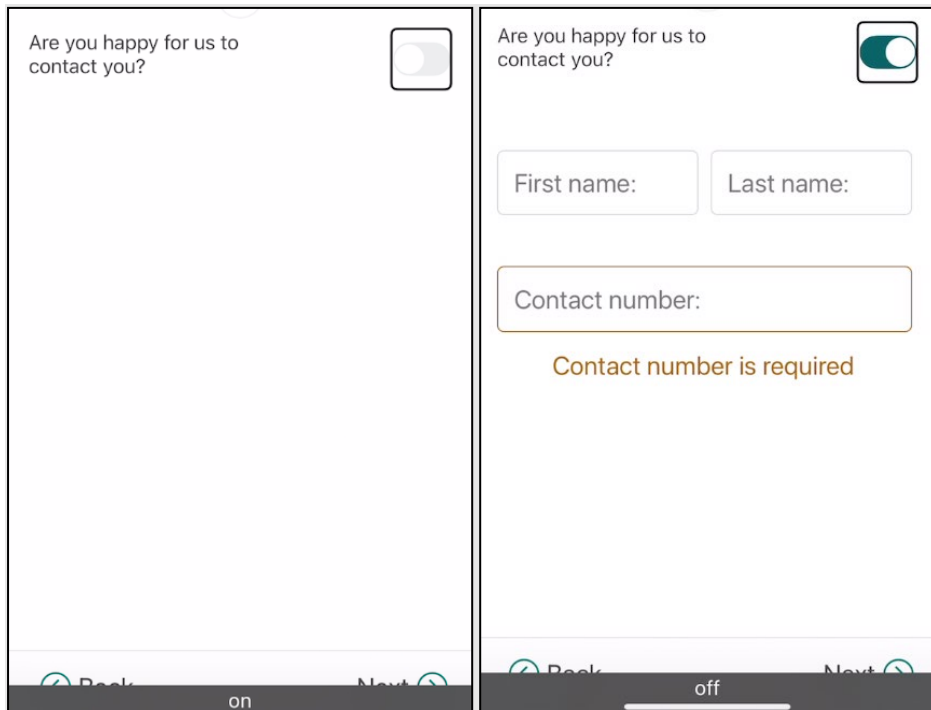
As an alternative we looked at Xamarin Community Toolkit's Semantic Effects - git hub bug raised (<https://github.com/xamarin/XamarinCommunityToolkit/issues/1543>)

Outcome: Cardiff Devs unable to fix due to third party bug.

Future plan: Xamarin to fix bug or upgrade their platform to Maui. Cardiff to update when Maui becomes available later in 2022. Preview stage available – not reliable enough to upgrade.

## Issue 4 – switches

On the Glass broken – Contact page the switch button on this page appears to have a reversed status. VoiceOver reads 'off' when you switch it on and vice versa. **This applies to iOS only.**

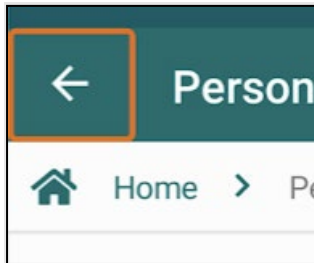


### Cardiff Council's response to 4.1.2 Name, role, value – Issue 4 switches

Action taken: CDDO agreed to disregard as confirmed as previously fixed (meeting 02/03/2022)

## Issue 5 – back arrow

On all pages except the Home page there is a 'header' element at the top which has a back arrow. This does not have an accessible name and is read out by TalkBack as 'unlabelled'. **This applies to Android only.**



### Cardiff Council's response to 4.1.2 Name, role, value – Issue 5 back arrow

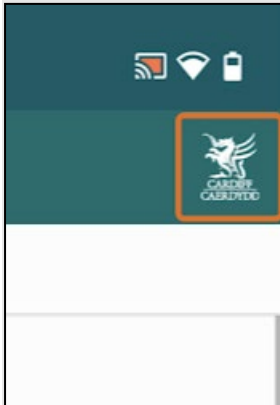
Action taken: Investigation revealed this as an Android native feature. Devs would have to implement custom fix.

Outcome: Project team have decided to leave this in anticipation of Android fix rather than custom code around it.

Future plan: Revisit July 2022 and review. Actively monitoring Android fix or update to third party solutions we have investigated.

## Issue 6 – Cardiff logo

In the 'header' there is a Cardiff logo in the top right. TalkBack reads this as 'Home' and knows it is interactive but does not identify it as a button. This suggests it may not have the correct role. **This applies to Android only.**



### Cardiff Council's response to 4.1.2 Name, role, value – Issue 6 Cardiff logo

Action taken: Investigation revealed this as an Android native feature. Devs would have to implement custom fix.

Outcome: Project team have decided to leave this in anticipation of Android fix rather than custom code around it.

Future plan: Revisit July 2022 and review. Actively monitoring Android fix or update to third party solutions we have investigated.

## **Appendix A - Orientation - Disproportionate burden assessment**

Our app has been developed to be used in portrait mode. Enabling orientation to landscape will cause loss of functionality across all app services and UI.

### **Scope**

This assessment relates to the orientation of the Cardiff Gov App. The app is currently fixed in portrait mode.

### **Benefits**

The benefits of making the app capable of rendering in landscape mode would be:

- Greater flexibility for users to view and navigate app on phones
- Greater flexibility for users to view and navigate app on tablets

### **Burden**

Our assessment of the burden to redevelop the app so that it can render effectively on both portrait and landscape mode is that all areas of the app will need development. Investigation and development would have to take place around the following (this list is not exhaustive):

- the iShare map (third party)
- Android – restarting app every time device is rotated
- Android - camera reloads app
- Android - keyboard conceals screen
- iOS – unable to see typing on screen
- council tax integration with Northgate (third party)
- every screen in the app would need UI changes.

### **Other factors**

Also relevant to this decision are that:

- Desire to use the app in landscape is low - we have never had any feedback, suggestion or complaint from customers in relation to this functionality in 4 years.
- The app currently meets accessibility requirements for a large number of users.

### **Assessment**

We consider that the costs of redeveloping the app to enable orientation from portrait to landscape where there is no evidence of demand would be a poor use of limited staff time and would represent a disproportionate burden on the organisation in terms of cost.

Assessment date: 02/04/2022

Last edited: 08/04/2022

## Appendix B – Overview of all issues and fix status 11/04/2022

WCAG Category	Sub category	Status 11 April 2022
<b>1.3.1 Info and relationships</b>		
	Issue 1 – text that looks like a heading (Image 1 and 3)	Review July 2022
	Issue 1 – text that looks like a heading (Image 2)	Fixed
	Issue 2 - programmatically associated labels (Image 1, 2, 3, 4 and 5)	Review July 2022
	Issue 3 - text that looks like a list	Fixed
	Issue 4 - placeholder labels	Review July 2022
	Issue 5 - visually hidden content	Fixed
<b>1.3.4 Orientation</b>		
	Issue 1 - Orientation	Disproportionate burden
<b>1.4.3 Contrast (minimum)</b>		
	Issue 1 - breadcrumbs	Fixed
	Issue 2 - placeholder text	Fixed
	Issue 3 - button gradients	Fixed
	Issue 4 - link colour	Fixed
	Issue 5 - error messages	Fixed
	– Issue 6 - app information in the hamburger menu	Fixed
<b>1.4.4 Resize text</b>		
	Issue 1 - text that does not resize	Fixed
	Issue 2 - partially cut off placeholder text	Fixed
<b>1.4.11 Non-text contrast</b>		
	Issue 1 - switches	Fixed
<b>2.1.1 Keyboard</b>		
	Issue 1 - Android keyboard functionality - Hamburger menu	Fixed
	Issue 1 - Android keyboard functionality - Pop-ups	Review July 2022
	Issue 1- Android keyboard functionality - Buttons	Fixed and Review July 2022
	Issue 1- Android keyboard functionality - Switches	Fixed
	Issue 2 - select options	Review July 2022
	Issue 3 - links	Review July 2022
<b>2.2.2 Pause, stop, hide</b>		

	Issue 1 - scrolling animation	Fixed
	Issue 2 - search animation	Fixed
<b>2.4.3 Focus order</b>		
	Issue 1 - search	Review July 2022
	Issue 2 - adding an image	Review July 2022
	Issue 3 - deleting a reminder	Review July 2022
	Issue 4 - map	Fixed
	Issue 5 - selecting options	Review July 2022
	Issue 6 - not available to report on app	Review July 2022
<b>2.4.4 Link purpose (in context)</b>		
	Issue 1 - privacy statement	Fixed
<b>2.4.6 Headings and labels</b>		
	Issue 1 - hamburger menu	Review July 2022
<b>2.4.7 Focus visible</b>		
	Issue 1 - buttons Image 1	Fixed
	Issue 1 - buttons Image 2	Fixed
	Issue 1 - buttons Image 3	Fixed
	Issue 1 - buttons Image 4	Fixed
	Issue 1 - buttons Image 5	Fixed
	Issue 1 - buttons Image 6	Fixed
	Issue 1 - buttons Image 7	Fixed
	Issue 1 - buttons Image 8	Fixed
	Issue 1 - buttons Image 9	Fixed
	Issue 1 - buttons Image 10	Fixed
	Issue 2 - breadcrumbs	Fixed
	Issue 3 - pop ups Image 1	Review July 2022
	Issue 3 - pop ups Image 2	Fixed
	Issue 3 - pop ups Image 3, 4 and 5	Review July 2022
<b>2.5.2 Pointer cancellation</b>		
	Issue 1 - map	Fixed
	Issue 2 - selecting location	Fixed
<b>3.2.1 On focus</b>		
	Issue 1 - select menus	Review July 2022

<b>3.2.2 On input</b>		
	Issue 1 - addresses	Fixed
<b>3.3.3 Error suggestion</b>		
	Issue 1 - non-descriptive error message	Fixed
<b>4.1.2 Name, role, value</b>		
	Issue 1 - links on Android	Fixed
	Issue 2 - links on iOS	Fixed
	Issue 3 - placeholder text	Review July 2022
	Issue 4 - switches	Fixed
	Issue 5 - back arrow	Review July 2022
	Issue 6 - Cardiff logo	Review July 2022



- Accessibility
  - Overview
  - Checks
  - Pages
  - PDFs
  - Mobile
  - Guidelines
  - WCAG 2.2 preview
  - Desktops
- Page 81
- Fully tested: 2 days ago

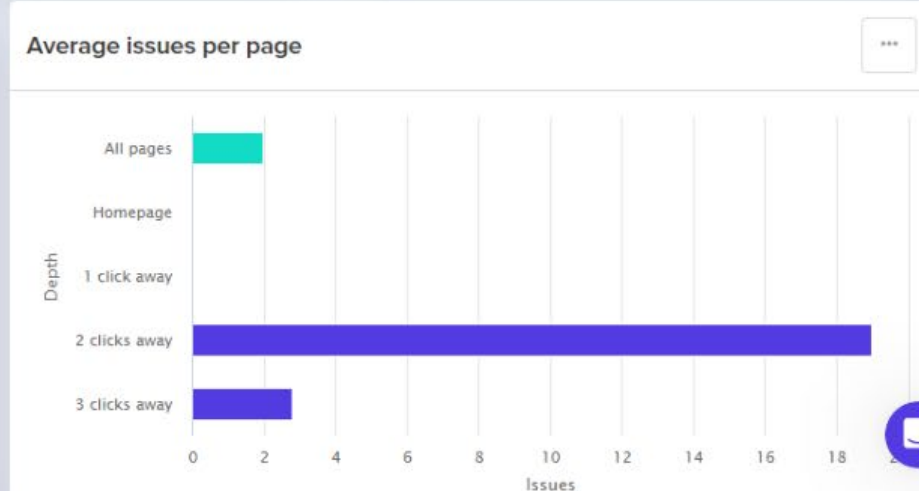
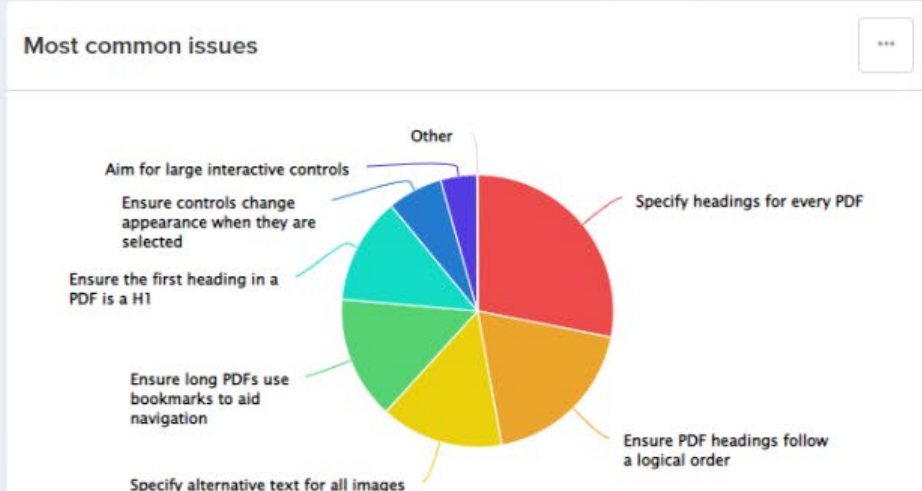
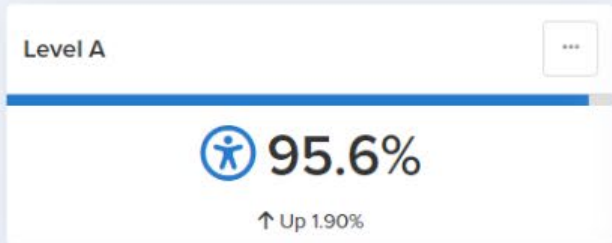


## Accessibility

How compliant this website is with the WCAG 2.1 accessibility standard.

For people improving accessibility

### SCORE OVER TIME



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