

Accessibility Conformance Report

International Edition

VPAT® Version 2.5 INT

VPAT® is a registered service mark of the Information Technology Industry Council (ITI).

Name of Product/Version: Puzzel.org — web application, release of 20 September 2026

Report Date: 20 September 2026

Product Description: Puzzel.org is a browser-based platform for making, sharing and playing interactive learning activities. A teacher builds an activity from one of 36 types — crosswords, quizzes, word searches, flash cards, matching, sorting, jigsaws and others — and shares it as a link, a classroom PIN, an embedded frame or an assignment in a learning management system. Players open it in a browser; depending on how the owner sets it up they play anonymously, register with fields the owner chooses, sign in with a Google or Microsoft school account, or arrive through an LTI 1.3 launch. The platform also includes Puzzel LMS, a lightweight course and class tool. The interface is available in 23 languages, including Arabic, which is presented right-to-left. There is no native mobile application and no hardware.

Contact Information: daan@puzzel.org

Notes:

This report is written by the person who builds the product, from the source code and from measurements taken against a running build. It is not a third-party certification and it has not been reviewed by an external auditor. Where a judgement rests on reading the markup rather than on operating the product with assistive technology, the remark says so.

Three things about the product shape what follows, and a buyer should read them before the tables:

1. **Support varies by activity type, and the variation is large.** A quiz is built out of ordinary buttons and inputs and works well with assistive technology. A jigsaw asks a player to fit pieces of a picture together and has no spoken equivalent at all. The tables below report the product as a whole, which means a criterion is marked "Partially Supports" when it holds for most of the product and fails for some activity types. Section §5 of the accompanying audit names which types.
2. **Much of what a player sees is written by the teacher.** Colours, fonts, images, the text of every question, whether a timer runs, whether sounds play, whether an image carries a description — these are the owner's choices, made per activity. This report covers what the platform does and what it makes possible; it cannot speak for an individual activity someone built. Where an owner's choice is the deciding factor, the remark says so.
3. **Print is a first-class alternative.** Most paper-friendly types have a printable version built in. For a player whom the screen version cannot serve, that is often the practical answer, and it is why it is mentioned here rather than buried.

Evaluation Methods Used:

- **Source review** of the rendered component tree — 660 components, the global stylesheet, and the settings configuration that decides what an activity can do.
- **Automated testing** with axe-core 4.10.2 over 24 page states in five languages including right-to-left Arabic, restricted to the WCAG 2.0 and 2.1 Level A and AA rule sets. Every reported issue was checked by hand; three were false positives caused by the tool's inability to composite a semi-transparent layer, and are named as such in the audit.

- **Keyboard and focus testing:** focus was walked across every focusable element on three representative pages after a real key press, recording the accessible name, whether `:focus-visible` matched and the computed focus indicator.
- **Defects found during the audit were fixed and re-measured**, rather than only recorded: the tables below describe the product as it now stands. What was changed is listed in the accompanying audit.
- **Layout testing:** reflow measured at 320, 400 and 640 CSS pixels, and the WCAG text-spacing override applied and re-measured for horizontal scrolling and newly clipped content.
- **Colour measurement** computed from the shipped design tokens rather than sampled from screenshots, so the figures move when the tokens do.

Not done: no testing with NVDA, JAWS, VoiceOver, TalkBack, Dragon or a switch device. This is the largest gap in the evidence behind this report, and it is the next thing planned. Automated rules catch roughly a third of WCAG failures; they are the floor of this report, not its ceiling.

Applicable Standards/Guidelines

Standard/Guideline	Included In Report
<u>Web Content Accessibility Guidelines 2.0</u>	Level A — Yes; Level AA — Yes; Level AAA — No
<u>Web Content Accessibility Guidelines 2.1</u>	Level A — Yes; Level AA — Yes; Level AAA — No
<u>Revised Section 508 standards — published January 18, 2017 and corrected January 22, 2018</u>	Yes
<u>EN 301 549 Accessibility requirements for ICT products and services — V3.2.1 (2021-03)</u>	Yes

Level AAA criteria are not evaluated and are not reported.

Terms

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

- **Supports:** The functionality of the product has at least one method that meets the criterion without known defects or meets with equivalent facilitation.
- **Partially Supports:** Some functionality of the product does not meet the criterion.
- **Does Not Support:** The majority of product functionality does not meet the criterion.
- **Not Applicable:** The criterion is not relevant to the product.
- **Not Evaluated:** The product has not been evaluated against the criterion. This can be used only in WCAG Level AAA.

WCAG 2.1 Report

Tables 1 and 2 also document conformance with:

- EN 301 549: Chapter 9 — Web, Chapter 10 — Non-web documents, section 11.1 (Software that provides a user interface) and section 12.1.2 (Product documentation).
- Revised Section 508: Chapter 5 — 501.1 Scope, 504.2 Content Creation or Editing, and Chapter 6 — 602.3 Electronic Support Documentation.

Table 1: Success Criteria, Level A

Criteria	Conformance Level	Remarks and Explanations
1.1.1 Non-text Content (Level A)	Partially Supports	Interface icons are decorative and hidden from assistive technology; every icon-only control carries a text name. Every image the interface draws has an <code>alt</code> attribute. A teacher can write a description for any picture they upload, and that description is both the <code>alt</code> and an on-screen chip any player can open, so a sighted player is offered it too. Three gaps: audio a teacher uploads has no text-alternative field anywhere in the product; pictures inside roadmap posts are marked decorative rather than described; and several activity types (jigsaw, hidden objects, spot-the-difference, label-this, a picture cryptogram) are pictorial by nature, where a text alternative would give away the exercise. For those the printable version is the offered alternative.
1.2.1 Audio-only and Video-only (Prerecorded) (Level A)	Does Not Support	A teacher may attach an audio clip to a clue, a card or a quiz question. The product provides no transcript field and no caption track for it, so an audio-only clue has no text alternative unless the teacher happens to repeat it in the surrounding text. Note the conflict the criterion does not resolve: in a listening exercise the transcript is the answer.
1.2.2 Captions (Prerecorded) (Level A)	Partially Supports	Video is never hosted by Puzzel.org. It is embedded from YouTube, youtube-nocookie or Vimeo and plays in that provider's own player, which offers the video's captions when the video has them and a caption control that works with a keyboard. Puzzel.org neither supplies captions nor requires them, and gives the teacher no field in which to add them, so whether a given video is captioned is the teacher's and the video owner's doing.
1.2.3 Audio Description or Media Alternative (Prerecorded) (Level A)	Does Not Support	The product provides no mechanism for an audio description or a full text alternative for embedded video.
1.3.1 Info and Relationships (Level A)	Partially Supports	Pages use <code>main</code> , <code>nav</code> , <code>header</code> and <code>footer</code> landmarks with one <code>h1</code> and a descending heading order; data tables use <code>th</code> ; letter-grid boards are marked up as <code>grid</code> , <code>row</code> and <code>gridcell</code> ; radio and switch controls carry their ARIA roles and states. Of 378 form controls, 314 take their name from an associated <code>label</code> or an explicit ARIA name. The remaining 41 are named only by their placeholder text, which disappears once the field has content — mostly search and filter boxes, over half of them inside an administration console not sold to customers. Error text is announced but is not programmatically tied to the field that caused it, and required fields are not marked as required in the accessibility tree.
1.3.2 Meaningful Sequence (Level A)	Supports	Reading order follows the DOM. Visual reordering is used 17 times across the whole product and never separates a control from its label or a heading from its section.
1.3.3 Sensory Characteristics (Level A)	Supports	Interface instructions name controls by their label, not by shape, size or position. Instructions inside an activity are written by the teacher and are outside the product's control.

Criteria	Conformance Level	Remarks and Explanations
1.4.1 Use of Color (Level A)	Partially Supports	In question-and-answer activities a verdict is a word ("Correct", "Not quite"), announced as well as shown, so colour is never the only carrier. Links in running text are underlined. One board is an exception: the wordle's three tile states — right letter in the right place, right letter in the wrong place, letter not in the word — are distinguished visually by background colour alone. Each tile does carry its state as text for assistive technology, which does not help a sighted player with a colour-vision deficiency.
1.4.2 Audio Control (Level A)	Supports	Nothing plays automatically. Audio is loaded with metadata only and started by the player, through a transport with play, pause and a seek control; sound effects on the board game and the wheel play in response to the player's own action and can be switched off by the activity's owner.
2.1.1 Keyboard (Level A)	Partially Supports	Typing activities are driven straight from the keyboard: on a crossword, arrowword, acrostic or wordle the player types and the letters land in the puzzle, arrow keys move between cells, Tab and Shift+Tab walk the grid and leave it at either end, and Escape hands the keyboard back to the page. Quiz, fill-in-the-gap, flash cards and every form-shaped type use standard controls. Card-moving activities (categorize, calculation, reorder, match-them-up, label-this) are played by pressing Enter or Space on a card and again on its destination — the same path a tap takes on a phone — because both the card and the destination are real buttons. The sliding puzzle answers the arrow keys; strands drives its whole grid from the keyboard. Four surfaces need a pointer: jigsaw, hidden objects and spot-the-difference, which are pictorial by nature, and the word seeker, whose letter grid is marked up as a grid but takes no keyboard focus. The builder's content editors for the pictorial types have the same limitation.
2.1.2 No Keyboard Trap (Level A)	Supports	Dialogs hold focus deliberately and release it on Escape or on their close button, restoring it to whatever opened them. Letter grids release Tab at the last cell and Shift+Tab at the first. No component was found that retains focus without a documented way out.
2.1.4 Character Key Shortcuts (Level A)	Partially Supports	The typing boards (wordle, hangman, typing practice) listen for single letter keys at the window, because typing is how those games are played. There is no way to remap or switch that off. The criterion's "active only on focus" exception is arguable — the board is the page — but it is not relied on here.
2.2.1 Timing Adjustable (Level A)	Partially Supports	An activity has no time limit unless its owner adds one, and the countdown is off by default. When a timer is running the player cannot stop it, extend it or turn it off, and no warning is given before it expires. One player-side control exists and is free of charge — a pause button — but the owner has to switch it on, and it is offered only on flash cards and the quiz, and only when a card or question timer is in use. Sessions do not expire; a signed-in teacher is not logged out on a timer.
2.2.2 Pause, Stop, Hide (Level A)	Partially Supports	Animation is decorative and finite, and all of it stops when the operating system asks for reduced motion. Nothing on the site scrolls, blinks or updates by itself except one case: a flash-card deck set to advance automatically, where the pause control is only offered when a card timer is also running. A deck that advances on a gap rather than a timer cannot be paused by the player.
2.3.1 Three Flashes or Below Threshold (Level A)	Supports	The fastest repeating animation anywhere in the product completes a cycle in 700 ms (1.4 Hz) and the text caret blinks at roughly 1 Hz. Nothing approaches three flashes per second, and everything stops under reduced motion.
2.4.1 Bypass Blocks (Level A)	Supports	A skip link is the first tab stop on every page, becomes visible when focused and moves focus to the main region. Landmarks give an alternative route.
2.4.2 Page Titled (Level A)	Supports	Every page sets a title describing it; a play page uses the activity's own name. The embedded frame carries no title of its own, because it is a frame inside somebody else's page — the snippet the product generates for a teacher to paste names the frame after the activity, so the host page announces it correctly.

Criteria	Conformance Level	Remarks and Explanations
2.4.3 Focus Order (Level A)	Supports	Focus order follows the reading order. Opening a dialog moves focus into it, Tab wraps at its edges, and closing returns focus to the control that opened it — except where the dialog's purpose was to change the board, in which case focus lands on the board so the next key press plays rather than re-opening the dialog. Content behind a lock or a spectator overlay is made inert, so it is neither reachable by Tab nor readable as playable.
2.4.4 Link Purpose (In Context) (Level A)	Supports	Every focusable element on the pages walked end to end had an accessible name — 135 on the home page, 52 on help, 47 on a library entry, none unnamed. Icon-only controls carry a text name.
2.5.1 Pointer Gestures (Level A)	Supports	Nothing requires a multi-point gesture. Every drag has a single-tap alternative: a card is picked up by tapping it and placed by tapping its destination; a word seeker's word is selected by tapping its first and last letter; the sliding puzzle's tiles answer a single tap.
2.5.2 Pointer Cancellation (Level A)	Supports	Actions complete on the up-event. Pointer-down is used only to begin a drag, which the criterion permits, and a drag that ends outside a valid target leaves the item where it was.
2.5.3 Label in Name (Level A)	Supports	Where a control has visible text, that text is its accessible name. No mismatch was found by inspection or by automated testing.
2.5.4 Motion Actuation (Level A)	Not Applicable	No function is operated by moving or tilting the device, and the product reads no device-motion sensor.
3.1.1 Language of Page (Level A)	Supports	Every page declares its language as a valid BCP-47 tag matching the interface language, set on the server from the URL. Arabic pages additionally declare right-to-left direction and the whole interface mirrors.
3.2.1 On Focus (Level A)	Supports	Focusing a control never submits a form, opens a dialog or navigates.
3.2.2 On Input (Level A)	Supports	Changing a setting updates the preview beside it, which is a change of content, not of context. No control navigates or submits on change without the user asking.
3.3.1 Error Identification (Level A)	Partially Supports	Errors are described in text — never by colour alone — and are announced when they appear; sign-in, registration, PIN entry, password reset, checkout and the course password gate all use an assertive live region. What is missing is the programmatic link: the message is not associated with the field through <code>aria-describedby</code> , and an invalid field is not marked invalid, so a screen-reader user hears the error but must find the field it refers to.
3.3.2 Labels or Instructions (Level A)	Partially Supports	Most fields carry a visible label and, where a format is required, an example. 41 controls are named only by a placeholder — see 1.3.1.
4.1.1 Parsing (Level A)	Supports	This criterion was removed in WCAG 2.2 and is always reported as Supports. No duplicate identifiers or malformed markup were reported by automated testing.
4.1.2 Name, Role, Value (Level A)	Partially Supports	Controls are built from real HTML elements wherever possible; where a component is composed, it carries the matching ARIA role and keeps its state in sync (<code>aria-selected</code> on grid cells, <code>aria-checked</code> on switches, <code>aria-expanded</code> on disclosures, <code>aria-modal</code> on dialogs). Three defects remain. 41 controls are named only by a placeholder. A letter-grid cell is named by its coordinates ("row 3 column 5") rather than by its clue. And a small number of names are hard-coded in English and therefore read in English on a page in another language: "close" on two play cards, "picture" on the hidden-objects scene and "roll" on the board-game dice.

Table 2: Success Criteria, Level AA

Criteria	Conformance Level	Remarks and Explanations
1.2.4 Captions (Live) (Level AA)	Not Applicable	The product contains no live audio or video. Multiplayer sessions synchronise game state, not media.
1.2.5 Audio Description (Prerecorded) (Level AA)	Does Not Support	See 1.2.3. No mechanism for audio description is provided for embedded video.
1.3.4 Orientation (Level AA)	Supports	No view is restricted to a single orientation. Layouts reflow to whatever the viewport is.
1.3.5 Identify Input Purpose (Level AA)	Partially Supports	Name, e-mail and password fields carry the correct autocomplete tokens on sign-in and sign-up. Other fields that collect information about the user — a school name, a display name chosen at registration — do not. Payment and billing details are never entered on Puzzel.org; they are entered on Stripe's own hosted checkout.
1.4.3 Contrast (Minimum) (Level AA)	Partially Supports	Body text on the page surfaces measures between 5.6:1 and 17.1:1, and text on the dark sections between 6.5:1 and 16.2:1. An automated sweep of 20 page states in four languages reports no contrast failure anywhere. Both accents that fell short were deepened during this audit: the primary action colour carried white text at 3.78:1 across the whole site and now measures 5.28:1, and the alert accent read 3.56:1 as small text and 2.91:1 on its own tint — which is where error chips draw it — and now reads 5.89:1 and 4.80:1. What remains is the part the platform does not control: the colours inside an activity are chosen by its owner, the default palette's plum and blue accents carry the default text colour at 4.14:1 and 4.39:1, and the builder does not warn an owner when a pair they pick falls below the threshold.
1.4.4 Resize Text (Level AA)	Supports	The product renders as ordinary HTML and text scales with browser zoom to 200 % and beyond without loss of content or function; this was measured at 200 % and at 400 %. Type is set in pixels, so raising the browser's default font size on its own has no effect — zoom is the mechanism that carries this criterion.
1.4.5 Images of Text (Level AA)	Supports	The interface contains no images of text; logotypes are excepted by the criterion. Text a teacher draws into an uploaded picture is their content, not the product's.
1.4.10 Reflow (Level AA)	Supports	Measured at 320 CSS pixels — 1280 px at 400 % zoom — on the home, pricing, help, accessibility and activity pages in English, German, Hungarian, Dutch and Arabic: content reflows into one column with no horizontal scrolling. A defect that caused a 16-pixel overflow on every page at exactly this width was found during this audit and fixed. Puzzle grids are the criterion's own exception for content requiring a two-dimensional layout: a grid scales down to a legible cell size and then scrolls in one direction inside its own box, leaving the page itself scrolling only vertically.
1.4.11 Non-text Contrast (Level AA)	Partially Supports	The keyboard focus indicator is a 2-pixel outline at 7.02:1 against the page, offset so it is never lost against the control it surrounds. Switches, buttons and selected states all carry a boundary or fill above 3:1. The exception is the resting border of text inputs and select controls, which measures 1.29:1 against the page and 1.37:1 on a card; the field's fill is a near-identical tone, so an empty field is identified mainly by its placeholder. A focused field's border rises to 15:1.
1.4.12 Text Spacing (Level AA)	Supports	With the criterion's spacing applied — line height 1.5, letter spacing 0.12em, word spacing 0.16em and paragraph spacing 2em — no content was clipped and no horizontal scrolling appeared.

Criteria	Conformance Level	Remarks and Explanations
1.4.13 Content on Hover or Focus (<u>Level AA</u>)	Supports	The product shows no overlay tooltip or pop-up of its own on hover. What hovering reveals is a card's own row actions, and in six places at that: they sit inside the card rather than over anything else, so the criterion's dismissibility requirement does not apply; they appear on keyboard focus as well as on hover, sit inside the area being hovered, and stay until hover or focus leaves. On touch devices they are simply always visible. Native browser tooltips, of which the product uses many, are excepted by the criterion.
2.4.5 Multiple Ways (<u>Level AA</u>)	Supports	A page can be reached from the site navigation, from the footer, from a human-readable sitemap page, from the help page's own search, and from the machine-readable sitemap.
2.4.6 Headings and Labels (<u>Level AA</u>)	Partially Supports	Headings describe their sections and are properly nested, one h1 per page. The 41 placeholder-only controls noted under 1.3.1 are the exception on the label side.
2.4.7 Focus Visible (<u>Level AA</u>)	Supports	Every interactive element receives a visible 2-pixel outline on keyboard focus, measured at 7.02:1 against the page; this was verified element by element on three pages — 51 of 52 focusable elements on one of them, the 52nd being a text field which is excluded deliberately and answers focus by darkening its border from 1.29:1 to 15:1. The indicator appears only for keyboard focus, so pointer users see no change.
3.1.2 Language of Parts (<u>Level AA</u>)	Partially Supports	The page's own language is always declared correctly, and interface text is fully translated into all 23 languages. Content inside an activity is not marked: a French vocabulary exercise presented on a Dutch interface carries no language marker, so a screen reader pronounces the French words with Dutch phonetics. The product has no per-activity content language setting on which to hang one. A small number of accessible names are still hard-coded in English — see 4.1.2.
3.2.3 Consistent Navigation (<u>Level AA</u>)	Supports	The header, its menu and the footer are identical in content and order on every page.
3.2.4 Consistent Identification (<u>Level AA</u>)	Supports	Components with the same function carry the same name and the same icon throughout, including the shared action bar that appears on every activity surface.
3.3.3 Error Suggestion (<u>Level AA</u>)	Partially Supports	Where the correction is known the message says it — which field is missing, that a password is too short, that a PIN has expired, that an e-mail address is already registered. As under 3.3.1, the suggestion is not programmatically associated with the field it concerns.
3.3.4 Error Prevention (Legal, Financial, Data) (<u>Level AA</u>)	Supports	Purchases are completed on Stripe's hosted checkout, which presents the order for review and can be abandoned without charge. Irreversible actions inside the product — deleting an account, deleting an activity, moving stored data to another region — require an explicit confirmation naming what will happen, and the four most sensitive account changes additionally require the user to re-enter their password.
4.1.3 Status Messages (<u>Level AA</u>)	Supports	Status is announced without moving focus, through 49 live regions, 36 status roles and 32 alert roles. This covers saving and loading, the result of every form submission, progress through an activity, completion, time expiring, whose turn it is, a locked or closed session, the latest bingo call, the wheel's outcome and a wordle row's verdict. All of it passes through the same gate as the visual feedback, so an activity whose owner has switched answer feedback off is silent about correctness as well as unmarked — a deliberate design decision, so that a screen-reader user is given exactly what a sighted player is given, and no more.

Table 3: Success Criteria, Level AAA

Level AAA criteria were not evaluated and are not reported.

Revised Section 508 Report

Chapter 3: Functional Performance Criteria (FPC)

Criteria	Conformance Level	Remarks and Explanations
302.1 Without Vision	Partially Supports	Form-shaped activities — quiz, flash cards, fill in the gap, and the account, dashboard, sharing and course surfaces — are built from real controls with names, roles and states, and their status changes are announced. Letter-grid puzzles are readable only as a sequence of cells named by coordinate, which is not how a sighted player reads a grid. Pictorial activities (jigsaw, hidden objects, spot-the-difference, label-this) have no non-visual mode. The printable version is offered as the alternative where the activity supports it.
302.2 With Limited Vision	Partially Supports	Content reflows at 320 CSS pixels (400 % zoom) with no horizontal scrolling, survives the WCAG text-spacing override, and carries a 2-pixel focus indicator at 7.02:1. Body text meets the contrast threshold, and both accents that did not — the primary action colour and the alert colour — were deepened during this audit. One exception remains inside the product: the resting border of text inputs measures 1.29:1. Beyond that, the colours inside an activity are the teacher's choice and are not checked against a threshold by the builder.
302.3 Without Perception of Color	Partially Supports	Verdicts are words, not colours, and links in text are underlined. The wordle's three tile states are distinguished visually by colour alone.
302.4 Without Hearing	Supports	No function depends on hearing. Sound effects accompany an action that is also shown, and a teacher can switch them off. An audio clue a teacher uploads is content, not function — see 1.2.1.
302.5 With Limited Hearing	Supports	See 302.4. Audio plays through the player's own transport with the system volume; nothing plays automatically or over anything else.
302.6 Without Speech	Not Applicable	No function requires speech input.
302.7 With Limited Manipulation	Partially Supports	Every dialog, menu and form is operable from the keyboard alone, and every drag has a tap-to-pick, tap-to-place alternative that a keyboard reaches through ordinary buttons. Four surfaces still require a pointer — see 2.1.1. A running timer cannot be extended by the player, which is a manipulation issue as much as a timing one.
302.8 With Limited Reach and Strength	Supports	No function requires simultaneous actions, sustained pressure, or a path-based gesture.
302.9 With Limited Language, Cognitive, and Learning Abilities	Partially Supports	The interface is available in 23 languages; navigation and component identification are consistent throughout; errors are written in plain language; motion stops when the system asks for reduced motion; and the platform carries no advertising, no pop-ups and no third-party scripts competing for attention on the play screen. Against that, a teacher can impose a countdown that a player cannot pause or extend, and the reading level of activity content is entirely the teacher's.

Chapter 4: Hardware

Criteria	Conformance Level	Remarks and Explanations
402–412	Not Applicable	Puzzel.org is a web application. It supplies no hardware.

Chapter 5: Software

Criteria	Conformance Level	Remarks and Explanations
501.1 Scope — Incorporation of WCAG 2.0 AA	See WCAG 2.x section	The product is a web application evaluated against WCAG 2.1 Level A and AA above, which incorporates WCAG 2.0 Level A and AA.
502 Interoperability with Assistive Technology	See WCAG 2.x section	The product runs in the browser and exposes its interface through standard HTML and ARIA; it installs no platform software and implements no platform accessibility API of its own.
503 Applications	See WCAG 2.x section	See 4.1.2 and 2.4.7. The product overrides no platform setting for colour, contrast, font type or size, and honours the operating system's reduced-motion preference.
504.2 Content Creation or Editing (Authoring Tool)	Partially Supports	The activity builder and the course editor are authoring tools, and the content they produce is evaluated above. The tool helps an author meet WCAG in several concrete ways, all free of charge: a description can be added to any picture and is offered to sighted players too; alternative text, a pause button and right-to-left support are not behind a paid plan; a printable version is generated automatically for the types that suit paper; and colours, fonts and timing are the author's to set per activity. What it does not yet do is prompt for them: it never requires a description for a picture, never warns that a chosen colour pair falls below the contrast threshold, and offers no field at all for a transcript of uploaded audio.
504.3 Prompts	Does Not Support	The authoring tool does not prompt an author to create accessible content. See 504.2.
504.4 Templates	Partially Supports	Starting points and example activities are provided and inherit the platform's own markup and focus behaviour. They are not separately evaluated for accessibility, and the default activity palette contains two accent colours that carry the default text colour at 4.14:1 and 4.39:1 rather than 4.5:1.

Chapter 6: Support Documentation and Services

Criteria	Conformance Level	Remarks and Explanations
601.1 Scope	See below	
602.2 Accessibility and Compatibility Features	Supports	The public accessibility statement at <code>/{{language}}/accessibility</code> documents, per activity type, what works with a keyboard, what a screen reader can and cannot do, where the gaps are, and what the alternatives are. It is available in all 23 languages. This conformance report is published alongside it.
602.3 Electronic Support Documentation	Partially Supports	Help and support documentation is delivered as ordinary web pages evaluated under WCAG 2.1 above, in all 23 languages. The documents offered for download — the data-processing agreement and the processor-agreement annexes — are PDFs generated from HTML with a real text layer and heading structure, but they are not tagged PDFs and have not been evaluated against PDF/UA.
602.4 Alternate Formats for Non-Electronic Support Documentation	Not Applicable	No non-electronic documentation is supplied.

Criteria	Conformance Level	Remarks and Explanations
603.2 Information on Accessibility and Compatibility Features	Supports	Support is by e-mail at daan@puzzel.org, answered by the person who builds the product. Accessibility problems are handled as defects rather than as feature requests, and what is being worked on is published on a public roadmap.
603.3 Accommodation of Communication Needs	Supports	Support is offered in writing by e-mail, which accommodates users who cannot use a telephone. No telephone support is offered to anyone, so no user group is disadvantaged relative to another.

EN 301 549 Report

Chapter 4: Functional Performance Statements

Criteria	Conformance Level	Remarks and Explanations
4.2.1 Usage without vision	Partially Supports	See 302.1.
4.2.2 Usage with limited vision	Partially Supports	See 302.2.
4.2.3 Usage without perception of colour	Partially Supports	See 302.3.
4.2.4 Usage without hearing	Supports	See 302.4.
4.2.5 Usage with limited hearing	Supports	See 302.5.
4.2.6 Usage with no or limited vocal capability	Not Applicable	See 302.6.
4.2.7 Usage with limited manipulation or strength	Partially Supports	See 302.7 and 302.8.
4.2.8 Usage with limited reach	Supports	See 302.8.
4.2.9 Minimize photosensitive seizure triggers	Supports	See 2.3.1.
4.2.10 Usage with limited cognition, language or learning	Partially Supports	See 302.9.
4.2.11 Privacy	Supports	Assistive technology uses the same interface as everyone else; no separate mode, account type or reduced feature set is involved, so using the product with assistive technology reveals nothing about the user. Nothing about a user's use of assistive technology is recorded.

Chapter 5: Generic Requirements

Criteria	Conformance Level	Remarks and Explanations
5.1 Closed functionality	Not Applicable	The product is not closed functionality; it runs in the user's own browser with their own assistive technology.
5.2 Activation of accessibility features	Supports	Platform accessibility features — screen readers, zoom, high-contrast modes, reduced motion — are not blocked, overridden or disabled. The reduced-motion preference is read and honoured.
5.3 Biometrics	Not Applicable	No biometric characteristic is used.
5.4 Preservation of accessibility information during conversion	Supports	Copying an activity, translating its copy into another language or copying it from the public library preserves every field, including the descriptions attached to pictures.
5.5 Operable parts	Not Applicable	No physical operable parts.
5.6 Locking or toggle controls	Supports	Toggle controls expose their state programmatically as well as visually, and their off state is visually distinct from a disabled one.
5.7 Key repeat	Not Applicable	Key repeat is the platform's; the product does not alter it.
5.8 Double-strike key acceptance	Not Applicable	See 5.7.
5.9 Simultaneous user actions	Supports	No function requires more than one action at a time.

Chapter 6: ICT with Two-Way Voice Communication

Criteria	Conformance Level	Remarks and Explanations
6.1–6.5	Not Applicable	The product provides no two-way voice communication. Multiplayer sessions synchronise game state only.

Chapter 7: ICT with Video Capabilities

Criteria	Conformance Level	Remarks and Explanations
7.1.1 Captioning playback	Partially Supports	Video is played by the embedded provider's player, which displays the video's own captions when it has them. See 1.2.2.
7.1.2 Captioning synchronization	Partially Supports	Handled by the embedded provider's player.
7.1.3 Preservation of captioning	Partially Supports	The product does not re-encode video and so cannot lose its captions; it simply passes the source URL through.
7.2 Audio description	Does Not Support	See 1.2.3.
7.3 User controls for captions and audio description	Partially Supports	The caption control is the embedded provider's, at the same level as its other playback controls.

Chapter 8: Hardware

Criteria	Conformance Level	Remarks and Explanations
8.1–8.5	Not Applicable	The product supplies no hardware.

Chapter 9: Web

Criteria	Conformance Level	Remarks and Explanations
9.1 – 9.4 (WCAG 2.1 A and AA)	See WCAG 2.x section	The product is web content. Tables 1 and 2 above are the record.
9.5 Non-interference	Partially Supports	Of the four non-interference criteria, three are met without reservation: nothing plays automatically (1.4.2), nothing flashes above the threshold (2.3.1) and no keyboard trap was found (2.1.2). The fourth, 2.2.2, is met except for a flash-card deck set to advance by itself with no card timer, where the player has no pause control.
9.6 Definition of "accessibility supported"	Supports	The product relies on HTML, CSS, WAI-ARIA and JavaScript as supported by current versions of Chrome, Edge, Firefox and Safari.

Chapter 10: Non-web Documents

Criteria	Conformance Level	Remarks and Explanations
10.1 – 10.2 (WCAG 2.1 applied to documents)	Partially Supports	The documents the product offers for download — a data-processing agreement and the annexes to a processor agreement — are PDFs generated from structured HTML, so they carry a real text layer, a reading order and heading structure, and are searchable and selectable. They are not tagged PDFs and have not been evaluated against PDF/UA. Two further outputs are the user's own content rather than the product's documentation: an activity's printable version, which is the browser's own print rendering of the page and inherits its structure; and a results export, which is a spreadsheet whose column headings are translated interface text.
10.3 – 10.5	Not Applicable	The downloadable documents contain no audio or video.

Chapter 11: Software

Criteria	Conformance Level	Remarks and Explanations
11.1 – 11.5 (WCAG 2.1 applied to software)	See WCAG 2.x section	The product is a web application; Tables 1 and 2 are the record. It installs no platform software.
11.6 Documented accessibility usage	Supports	The public accessibility statement documents what works and what does not, per activity type.
11.7 User preferences	Partially Supports	The operating system's reduced-motion preference is honoured throughout, and browser zoom is fully supported. Type is set in pixels, so a raised default font size in the browser has no effect on its own. Colour and contrast within an activity are set by its owner rather than taken from the platform.

Criteria	Conformance Level	Remarks and Explanations
11.8 Authoring tools	Partially Supports	See 504.2, 504.3 and 504.4.

Chapter 12: Documentation and Support Services

Criteria	Conformance Level	Remarks and Explanations
12.1.1 Accessibility and compatibility features	Supports	See 602.2.
12.1.2 Accessible documentation	Partially Supports	See 602.3.
12.2.2 Information on accessibility and compatibility features	Supports	See 603.2.
12.2.3 Effective communication	Supports	See 603.3.
12.2.4 Accessible documentation	Partially Supports	See 602.3.

Chapter 13: ICT Providing Relay or Emergency Service Access

Criteria	Conformance Level	Remarks and Explanations
13.1 – 13.3	Not Applicable	The product provides no relay service and no access to emergency services.

Legal Disclaimer

This report is provided by Puzzel.org for informational purposes. It describes the state of the product on the date given above, as assessed by its developer using the methods described under *Evaluation Methods Used*. It is a self-assessment: it has not been audited or certified by a third party, and no testing with screen readers or other assistive technology was carried out for it. It is not a warranty, and it does not constitute legal advice or a statement of compliance with any law or regulation.

Much of what an individual player experiences is determined by the teacher who built the activity — its colours, its text, its pictures and their descriptions, whether a timer runs and whether sounds play. This report covers the platform and what it makes possible; it cannot speak for any particular activity built with it.

Accessibility problems are treated as defects. If something in this product blocks you or a student, write to daan@puzzel.org describing the activity type and the assistive technology involved; replies come from the person who builds the fixes.

VPAT® is a registered service mark of the Information Technology Industry Council (ITI). This report follows the VPAT 2.5 INT template; ITI has neither reviewed nor endorsed it.