MIDNIGHT WEBS

FREE RESOURCE · ACCESSIBILITY CHECKLIST

Website Accessibility Checklist: WCAG 2.2

Around one in six people worldwide lives with a disability, and in the EU accessibility is now a legal duty for many online shops and services. This checklist turns WCAG 2.2 Level AA into concrete checks you can run on your own site, in order of impact.

Updated November 2026 | 14 min read | 44 checks

WHO SHOULD USE IT	WHAT IT COVERS	STANDARD
Teams responsible for a public website, especially one that sells to EU consumers	7 areas, from legal scope to a 30-day plan	WCAG 2.2 Level AA (55 success criteria; 6 new in 2.2)

START HERE

Unplug your mouse and try to complete your main task (buy, book, contact) with the keyboard alone. If you get stuck, you have found your first priority.

TICK THE BOX WHEN DONE · MUST DO = HIGHEST IMPACT

01 Know which rules apply to you

Accessibility is a legal duty for more businesses than most owners realise, but it is also the best test of whether your site is clear.

- [ ] MUST DO **Check whether the European Accessibility Act covers you**

  It has applied since 28 June 2025 to consumer-facing services including e-commerce, consumer banking, e-books, passenger transport and electronic communications. Businesses outside the EU are covered if they sell to EU consumers.

- [ ] MUST DO **Know the main exemption**
  Microenterprises that provide services (fewer than 10 staff and turnover or balance sheet up to €2 million) are exempt from the service requirements. Anything else, such as "disproportionate burden", must be assessed and documented.

- [ ] **Use WCAG 2.2 AA as your working target**
  The EAA relies on the European standard EN 301 549, which currently references WCAG 2.1 AA. Aiming for 2.2 AA exceeds it and is where the standard is heading.

- [ ] **Check your country's rules**
  Each EU member state sets its own enforcement body and penalties.

- [ ] **Know what AA means**
  All Level A and AA criteria: 55 in total, six of them new in 2.2 (focus not obscured, dragging alternatives, target size, consistent help, redundant entry and accessible authentication).

- [ ] **Publish an accessibility statement**
  Describe how you meet the requirements, known gaps, and how to report a problem.

HOW TO CHECK

Write down, in one paragraph, whether the EAA applies to your business and why. Save it with the date.

02 Perceivable: see it, hear it, understand its structure

People have to be able to perceive your content in some form. Most fixes here are cheap and help every visitor.

- [ ] MUST DO **Give meaningful images useful alt text**
  Describe the purpose, not "image of". Use `alt=""` for purely decorative images so screen readers skip them (1.1.1).

- [ ] MUST DO **Meet colour contrast**
  4.5:1 for normal text and 3:1 for large text, icons and input borders (1.4.3, 1.4.11). Check with a contrast tool, including text on images and on hover and disabled states.

- [ ] **Add captions and transcripts**
  Captions for video, transcripts for audio, and no autoplay with sound (1.2).

- [ ] **Do not use colour as the only signal**
  Error states, required fields and links inside text need an extra cue such as an icon, label or underline (1.4.1).

- [ ] **Use real headings, lists and tables**
  Headings in order, lists as lists and table headers marked up, so assistive tools can navigate (1.3.1).

- [ ] **Support zoom and reflow**
  Content must work at 200% zoom and at 320 CSS pixels wide without horizontal scrolling (1.4.4, 1.4.10).

- [ ] **Keep text as text**
  Avoid putting words inside images, and let users change text spacing without losing content (1.4.12).

HOW TO CHECK

Zoom the browser to 400% on a laptop (equal to a 320 px layout). Nothing should overlap or need sideways scrolling.

03 Operable: use it with keyboard, touch or voice

If a task needs a precise mouse movement, many customers cannot complete it. WCAG 2.2 added several checks here.

- [ ] MUST DO **Make everything work with a keyboard**
  Every link, button, menu and form control reachable with Tab, in a logical order, with Enter and Space to activate (2.1.1). Add a "Skip to content" link (2.4.1).
- [ ] MUST DO **Show a clear focus indicator**
  Do not remove outlines. Make sure sticky headers, cookie banners and chat widgets do not cover the focused element (2.4.7, new 2.4.11).
- [ ] MUST DO **Make touch targets big enough**
  At least 24 × 24 CSS pixels, or with equivalent spacing (new 2.5.8). Aim for 44 × 44 for primary buttons.
- [ ] **Offer an alternative to dragging**
  Sliders, sortable lists and map interactions need a click or button alternative (new 2.5.7).
- [ ] **Remove keyboard traps**
  Modals, menus and embedded widgets must be closable with Escape and return focus to where the user was (2.1.2).
- [ ] **Let users pause moving content**
  Carousels and animations need a pause control, and should respect `prefers-reduced-motion` (2.2.2).
- [ ] **Give enough time**
  Warn before session timeouts and allow extension (2.2.1).

HOW TO CHECK

Tab through your homepage. You should always see where you are, never get stuck, and reach the main content within two or three presses.

04 Understandable: forms, errors and predictability

Forms are where accessibility problems most often become lost sales.

- [ ] MUST DO **Give every field a visible, connected label**
  Use `<label for>`. Placeholders are not labels; they vanish while typing (1.3.1, 3.3.2).

- [ ] MUST DO **Write specific error messages**
  Next to the field, in text, saying what went wrong and how to fix it (3.3.1, 3.3.3). Move focus to the first error or announce the error summary.

- [ ] **Add autocomplete attributes**
  `autocomplete="name"`, "email", "tel", "postal-code" lets browsers and assistive tools fill known data (1.3.5).

- [ ] **Do not ask for the same data twice**
  Auto-fill it or let users select from earlier answers (new 3.3.7).

- [ ] **Make login accessible**
  Allow paste and password managers, and offer an alternative to memory or puzzle tests, such as email links, passkeys or a CAPTCHA with a non-cognitive alternative (new 3.3.8).

- [ ] **Keep help in the same place**
  Contact details, chat or help links should appear in the same relative position on every page (new 3.2.6).

- [ ] **Declare the language**
  Set lang on the page, and mark passages in other languages (3.1.1, 3.1.2).

HOW TO CHECK

Submit your contact form empty and with an invalid email using only the keyboard. Could you understand and fix each error?

05 Robust: code that works with assistive technology

Assistive technology reads your code, not your design.

- [ ] MUST DO **Use native HTML elements first**
  A `<button>` already has role, name, keyboard behaviour and focus. A clickable `<div>` needs all of that added by hand.

- [ ] MUST DO **Give custom components name, role and state**
  Menus, tabs, accordions and dialogs need correct ARIA and keyboard support, following the ARIA Authoring Practices patterns (4.1.2).

- [ ] **Announce status messages properly**
  Use `role="status"` or `aria-live` for "added to cart" or "form sent" so users hear it without losing focus (4.1.3).

- [ ] **Do not hide focusable content from assistive tech**
  `aria-hidden` on an element containing links or buttons creates invisible tab stops.

- [ ] **Audit third-party widgets**
  Cookie banners, chat, booking, reviews and payment widgets are the most frequent source of failures on otherwise accessible sites.

- [ ] **Validate your HTML**
  Duplicate IDs and broken nesting confuse labels and relationships.

HOW TO CHECK

Run an automated check (axe DevTools, WAVE or Lighthouse) on each template and fix every error, then move on to manual testing.

06 Test with tools and with people

Automated tools catch only some of the problems, often well under half. A site can pass a scanner and still be unusable.

- [ ] MUST DO **Run an automated scan on every key template**
  Home, article, product, cart, checkout, contact and login. It catches missing alt text, contrast and label problems quickly.
- [ ] MUST DO **Do a keyboard-only pass of your main journeys**
  Search, product, cart, checkout and contact, all without a mouse.
- [ ] **Test with a screen reader**
  VoiceOver on Mac and iPhone, NVDA on Windows (free), TalkBack on Android. Listen to a page and a form being read.
- [ ] **Test at 200% zoom and 320 px width**
  Plus text-only enlargement.
- [ ] **Include disabled users in testing**
  Even three or four participants reveal problems no checklist will.
- [ ] **Record issues with severity, owner and date**
  A tracked backlog is what makes progress visible.

HOW TO CHECK

After fixes, repeat the keyboard pass and screen-reader pass on the same journeys and compare with your first results.

07 A 30-day remediation plan

Fix what blocks purchases and contact first, then make accessibility part of normal work.

- [ ] **Week 1: Scope and baseline**
  Confirm legal scope, run automated scans and a keyboard pass, list blockers by impact.
- [ ] **Week 2: Quick wins**
  Alt text, contrast, labels, focus styles, cookie banner behaviour and target sizes.

- [ ] **Week 3: Forms and complex components**
  Checkout, login, menus, carousels and third-party embeds; first screen-reader test.
- [ ] **Week 4: Statement and process**
  Publish the accessibility statement, train editors, add accessibility checks to design and release.
- [ ] **Then retest quarterly**
  And after every change to templates, themes or checkout.

HOW TO CHECK

At day 30, repeat the first-week scan and keyboard pass. The number of blockers should be near zero.

Sources and further reading

W3C: What's new in WCAG 2.2
https://www.w3.org/WAI/standards-guidelines/wcag/new-in-22/

W3C: WCAG 2.2 Recommendation
https://www.w3.org/TR/WCAG22/

W3C WAI: European Union accessibility policy
https://www.w3.org/WAI/policies/european-union/

European Commission: European Accessibility Act
https://commission.europa.eu/strategy-and-policy/policies/justice-and-fundamental-rights/disability/european-accessibility-act-eaa_en

Need a hand with this?

Midnight Webs designs, secures and maintains websites for small businesses. Tell us what you need and we will scope it.

midnightwebs.com/estimate

Read online: midnightwebs.com/resources/website-accessibility-wcag-2-2-checklist