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THE LEGISLATIVE ASSEMBLY FOR THE AUSTRALIAN CAPITAL TERRITORY

ELEVENTH ASSEMBLY

**Standing Committee on Environment and Planning Report No 3 of 2025 - Inquiry into the
Procurement and Delivery of MyWay+**

Government Response

**Presented by
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Minister for Transport
February 2026**

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Introduction

The ACT Government welcomes the Report on the Inquiry into the procurement and delivery of MyWay+ (the Inquiry) and thanks the Standing Committee on Environment and Planning (the Committee) for its comprehensive consideration of the procurement and delivery of this complex digital transformation program. The Government has agreed to all seven recommendations from the Committee.

The ACT Government acknowledges the contributions of community members, industry representatives and stakeholders who made submissions and attended Inquiry hearings to provide evidence, as well as front line staff in Transport Canberra who supported Canberrans with the transition.

A modern and accessible public transport system is a core component of the ACT Government's vision for Canberra as a progressive, sustainable, and future-ready city that leads the nation and is one of the most liveable cities in the world.

The delivery of MyWay+ was the most significant upgrade to Canberra's public transport ticketing technology in over a decade, and represented a major digital transformation project undertaken by the ACT Government.

Whilst it was conceived as an ambitious initiative to modernise Canberra's public transport system, the Government acknowledges that the system and implementation did not work as intended when MyWay+ went live on 27 November 2024.

The project has delivered important advancements, namely the ability for all Canberrans and visitors to tap on and off public transport services using their credit or debit card for the first time, however the transition to the new system was not smooth. A range of system issues negatively impacted our passengers, and it did not deliver a fully accessible system at go-live.

We are sorry for the impact that issues with the MyWay+ system have had on commuters.

Whilst many of these were addressed immediately at launch, other patches and updates to the system took far longer and we apologise for this impact on Canberrans. These have been well documented by the Committee and in the evidence provided to the Inquiry. The actions that the ACT Government has taken since launch, with NEC, to prioritise and address system improvements have seen a significant lift in performance of MyWay+.

The core functionality of the MyWay+ system – the ability to pay for public transport – is now working 99.18% of the time as measured by successful end-to-end payments using MyWay+ validators. Canberrans and visitors are embracing the use of credit and debit card as payment for public transport in addition to using regular travel cards with 39% of passengers using this payment method daily.

A structured program of regular updates has seen a number of corrective actions to achieve Level AA conformance with web accessibility requirements for outstanding elements

implemented in parallel with improvements to uplift real world usability, which go beyond these requirements, for the MyWay+ customer portal (website). These will be reassessed by the independent assurer Get Skilled Access.

To address the issues arising from the MyWay+ project, the ACT Government has not only undertaken concrete remedial actions to address both specific issues in the performance of MyWay+ system with NEC, but also to change the way we deliver complex ICT projects in the future.

Actions taken to address systemic issues arising from MyWay+

The Government recognises the range of systemic issues that arose from the implementation of MyWay+ relating to ICT and project management capability in the ACT Public Service, user testing, cyber resilience and customer service. Actions to improve the delivery of complex ICT projects in the Territory in these areas include:

- **Establishing Digital Canberra**, as a central capability to deliver complex ICT Projects. The MyWay+ program is to be transferred to Digital Canberra once practical completion is achieved.
- **Development of the *ACT Government Project Management Framework*** in partnership with the Australian Institute of Project Management.
- **Updating the *Best Practice Design and Delivery Guide for ICT Projects***, including the development of detailed guidance on effective user testing, including community-based testing.
- **Post implementation review of MyWay+ procurement and delivery**, including all aspects of the solution design, program management and delivery (including risk management), testing and post implementation operations.
- **Regular cyber security assurance**, including penetration testing by two independent firms, engaged as part of MyWay+ operations.
- **Developing a new Transport Canberra Customer Service Plan**, including establishing a regular survey of Transport Canberra bus users to monitor performance.

Establishing Digital Canberra

Responsibility for delivering ICT systems has changed across ACT Government. The establishment of the new ICT delivery agency, Digital Canberra, recognises the need to build capability and expertise with the ACT Government in managing complex ICT projects. The agency was established following the MyWay+ launch, and will work across agencies, including Transport Canberra to take lessons learnt from the MyWay+ implementation, to reform how our Government delivers these projects. The model will be similar to the successful establishment of Infrastructure Canberra to provide central expertise and co-ordination in the delivery of complex infrastructure projects across the ACT Government.

This expert agency will take the lead in implementing actions that respond to the recommendations by the Committee that relate to the delivery of ICT projects.

Development of the *ACT Government Project Management Framework*

The ACT Government is seeking to improve project management practices, leveraging lessons learned from recent digital projects through the introduction of a Project Management Framework.

Since late 2024, a program of project management uplift has been underway. The development of the Framework has harnessed our proven project management skills in Infrastructure Canberra, with support from all Directorates, and is in the final stages of development.

The Framework has been developed in partnership with the Australian Institute of Project Management and will deliver a best-practice framework to support transparency, accountability, and strategic alignment across a diverse portfolio of ACT government projects. The Framework will also include a suite of tools and templates to guide ACTPS staff when managing projects, covering planning, governance, risk management, reporting, review and evaluation.

Updating the *Best Practice Design and Delivery Guide*

The ACT Government's *Best Practice Design and Delivery* guide has been in place since 2022 to guide the ACT Public Service in building human centred ICT products and services. It provides plain English guidance and a range of tools and templates to assist in the design and delivery of initiatives, including gathering community input and feedback.

Best Practice Design and Delivery emphasises that to be able to deliver human centred products and services, we need to understand the user experience and the intended outcome, and then co-design the change. Testing is critical to be able to ensure a change is delivering on its intended outcome as expected and there is a range of different testing that addresses people, process and technology elements.

The *Best Practice Design and Delivery* guide was updated in 2024 to provide additional information on how to implement fit-for-purpose project governance and project reporting, and how dedicated multi-disciplinary teams are best placed to design and deliver large projects. The Guide includes a summary version on the public-facing ACT Government website, with more detailed guidance, including practical toolkits and industry insights, available to ACTPS staff.

The ACT Government will review the effectiveness of its *Best Practice Design and Delivery* guide to ensure lessons learnt from both digital and non-digital projects are systematically incorporated in a consistent way. Given the additional complexities inherent in managing large digital projects, detailed guidance material with a specific focus on technology change will continue to be required and managed by Digital Canberra as the lead technology agency. Digital Canberra will review the effectiveness of current material and identify where it should be adapted or extended to provide more complete or better tailored advice.

In recognition of the lessons learned from the MyWay+ rollout, Digital Canberra will publish an update to the *Best Practice Design and Delivery* guide that more clearly emphasises the importance of community and user-based testing. This update will incorporate expanded

material on how to design, implement and assure a community and user-based testing program. This update will be more than a checklist – it will provide the guidance and resources for project managers and Project Boards to enable them to develop an appropriate end-to-end testing plan for each project. This expanded guidance material will be supported by a new coordination capability in Digital Canberra that will assist with community engagement.

Conducting independent assurance of the MyWay+ system

As part of the progressive development of a formal post implementation review of MyWay+, visiting officers from Transport for New South Wales (TfNSW) provided valuable insight by contributing to a peer-review of the ACT Government's approach to the procurement and delivery of MyWay+.

The Executive Director for Financial, Technology and Commercial, Ticketing Installation Manager and Manager for Applications and External Systems from TfNSW were hosted by Transport Canberra during the week of 9 February 2026. Their insight came from leading similar, complex digital ticketing programs including the procurement and delivery of the original Opal ticketing system and its subsequent upgrades, as well as a new road tolling system, and the current procurement of Opal Next Generation. This review included physical examination of software components and hardware installation of MyWay+ across both the bus and light rail network.

The post implementation review and outcomes of the peer review by TfNSW will be de-briefed to Digital Canberra, that will have responsibility for large digital procurements, including the risk management of ICT projects in the future.

Regular independent cyber security assurance testing

A program of cyber security assurance testing, including penetration testing, of MyWay+ is conducted on a quarterly basis by an independent and external cyber security assurer engaged by NEC.

Augmenting NEC's testing, City and Environment Directorate (CED) has engaged a separate, independent cyber security assurance firm to conduct assurance, including penetration testing, as part of the Directorate's Payment Card Industry, Data Security Standard compliance of MyWay+ on a monthly basis.

Developing a new Transport Canberra Customer Service Plan

Transport Canberra will develop a new Customer Service Plan this year to improve the delivery of public transport services to the Canberra community. The implementation of MyWay+ has highlighted the need for Transport Canberra to better understand the community's expectations of our public transport services and to outline clearly how Transport Canberra will deliver services in accordance with these expectations. This will include:

- how customer feedback and suggestions are taken into account when delivering new networks and improvements to customer facing elements, such as the MyWay+ account and mobile application;
- how accurate timetable information is made readily available, including at interchanges and bus stops, and through the supply of Real Time Passenger Information through ACT Government and third-party channels; and
- how we will work with our contracted providers to ensure goods and services are delivered to the expectations of the ACT Government.

This year Transport Canberra will undertake the first regular survey of passengers using our bus network to inform development of the Plan, as well as consultation with the community and peak bodies.

Updates on the performance of MyWay+

Transport Canberra has continued to take action with NEC to address system issues and improve the performance of MyWay+.

A number of key updates have occurred since the Government has engaged with the Inquiry. These are detailed throughout the ACT Government's responses to the findings and recommendations, and can be categorised as occurring across four main areas:

- **Accessibility of the MyWay+ system**, particularly improvements to web-based components (the customer portal) through an ongoing schedule of software releases (see [Finding 9](#) and [Finding 19](#)).
- **Usability of the MyWay+ system**. The core functionality of a ticketing system is to accept payments for public transport. Since MyWay+ went live, there has been gradual improvement to the performance of validators and payments. Since late last year, validator performance, as measured by availability, useability and reliability has grown continually, with the most refinement currently seeing performance at 99.18%.
- **Cyber security**, including a comprehensive program of cyber assurance (as stated above), as well as regular testing and rapid responses to reported vulnerabilities under ACT Government Cyber Security guidance (see [Finding 22](#)).
- **Integration, assimilation and validation of MyWay+ data** to reinstate the publication of public transport patronage data on the ACT Open Data Portal (see [Finding 18](#)).

An example of addressing complex issues, whose earliest stages were highlighted in the [Government Submission to the Inquiry](#), was the near 12-month effort to improve the availability, useability and reliability of validators. Transport Canberra worked with NEC to improve their end-to-end performance in having the system powered on, being ready and able to accept payments and to have these charged at the correct rates. This work included:

- disabling the off state of on-bus validators in between stops
- replacing on-bus validator cradles to a new, tighter fitting configuration;
- upgrading hardware connections on the driver console;

- changing communication connection within the validators themselves; and
- associated software updates.

Transport Canberra has worked with NEC to refine validator performance metrics reporting to reflect usability. To provide transparency, this is now published weekly on the [Transport Canberra website](#).

Transport Canberra continues to work with NEC to deliver outstanding components defined in the Statement of Work under Schedule 2 of the contract, and outlined in Attachment B of the [Government Submission to the Inquiry](#). This includes the delivery of Group Accounts, Delegated Users and Institutional Accounts. This functionality has progressed to the testing stage following acceptance of the re-designed proof of concept, to improve the sign-up process, and customer experience (see [Finding 10](#)).

Future enhancements to MyWay+

Transport Canberra is working with NEC to deliver a program of ongoing improvements and functionality in the MyWay+ system and is planning and investigating future enhancements that will further improve customer experience and respond to the changing needs of our community over time.

A key feature of the contract for the Next Generation Ticketing System for Transport Canberra is the support for continuous improvement throughout the life of the 10-year contract with NEC. This is captured at clause 27 of the contract with associated reporting on Innovation and Continuous Improvement required under the Statement of Work at Schedule 2.

27. Quality Assurance and Continuous Improvement

- *the identification and application of proven techniques and tools from other areas of its operations that would benefit the Territory either operationally or financially*
- *proactively and promptly advising the Territory of all new trends in technology and methodology related to the Goods and Services and, in particular, of any potential increases or decreases in the Charges for the Goods and Services;*
- *continually planning for the evolution and innovation of the Goods and Services and modifying the manner in which the Goods and Services are supplied to improve the quality, effectiveness and efficiency of the Goods and Services and their delivery without increasing the Charges.*

Areas for future enhancement currently being investigated by Transport Canberra include:

- **Expanded payment options**, as an alternative to the in-app MyWay+ travel token, QR code (see [Finding 12](#)), including:
 - **Enabling MyWay+ account “top-ups” using Google Pay and Apple Pay** through the implementation of payment option through the MyWay+ customer portal (implementation underway).

- **Apple Wallet “Express mode”** which would allow NFC payments for transport without having to wake or unlock a device; Google Wallet already allows users to pay using NFC without the need to unlock their device. This has been trialled by TransPerth in an Australian first and will be implemented in MyWay+ following localised testing (planned).
- **Digital MyWay+ Card** which would use a digital, NFC MyWay+ token (card) that can be saved in the users Apple or Google wallet, and operate similar to credit/debit cards with fares deducted from the user’s linked MyWay+ account when tapping on and off. A similar technology has been implemented by Public Transport Victoria, with the digital “Myki” card, and is being considered as an alternative to the QR code within MyWay+ (proposed, under investigation).
- **Balance displays on validators**, similar to the old MyWay system (see [Recommendation 1](#)).

Transport Canberra is exploring options and completing an assessment of requirements to inform a funding proposal to be considered through the 2026-27 Budget process for communicating real-time information to passengers at key locations, including public transport interchanges; the provision of **Passenger Information Displays at interchanges** was not a specification of the contract with NEC.

Response to Recommendations

Recommendation 1

The committee recommends that the ACT Government continue its investigations and ensure that account balance information is available on validator screens as soon as possible.

Government response

Agreed.

Under the previous card-based ticketing system, MyWay, displaying the balance on validators after a tap was technically simple as the card itself held the travel balance and transaction information, allowing the validator to instantly read and display this data at the point of tap-on or tap-off.

By contrast, MyWay+ is an account-based ticketing system, which enables multiple payments methods and linked devices to draw from a single account, in addition, to the traditional “travel card” of MyWay past. Passengers are now also able to travel “anonymously” (i.e. without being linked to a MyWay+ account) by simply tapping on and off with their debit or credit card. This introduces a considerably greater complexity for real-time balance displays compared to the previous system.

Transport Canberra and NEC Australia are currently assessing the feasibility of implementing real-time balance display within this new system framework for MyWay+ accounts, with consideration given to latency, network capacity, and system integration requirements.

Recommendation 2

The Committee recommends that the ACT Auditor-General consider examination of the MyWay+ project team’s project documentation, as highlighted in the Projects Assured report.

Government response

Agreed.

This is a matter for the ACT Auditor-General, however the Minister for Transport will write to the ACT Auditor-General recommending an examination of the MyWay+ project team’s project documentation.

Recommendation 3

The Committee recommends that the ACT Government conduct an internal review of risk management within the MyWay+ project, with a view to identifying and implementing specific process changes in how risks are managed and mitigated in large digital procurements. Further, that the Minister for Transport report to the Legislative Assembly on the process changes identified and how they are being implemented and that this report be updated in the assembly once every six months until the end of the term.

Government response

Agreed.

The ACT Government requires thorough and robust risk management of all procurements under the *Government Procurement Act 2001*, including appropriate oversight and review for major programs such as MyWay+.

The ACT Government's approach to risk management for large digital procurements is being strengthened through the establishment of Digital Canberra as a stand-alone agency with responsibility for technology across government. Responsibility for new Tier 1 initiatives with significant technology components will be led by Digital Canberra, consolidating specialist expertise in digital procurement, program management, risk, assurance and delivery oversight within a single agency. This will support earlier and more consistent identification, assessment and management of complex digital risks across the project lifecycle. Centralising specialist technology expertise within Digital Canberra will enable a capability maturity uplift in how digital risks are understood and managed across government.

As part of the progressive development of a formal post implementation review of MyWay+, visiting officers from Transport for New South Wales (TfNSW) provided valuable insight into the risk management practices of the MyWay+ program through a peer-review of the ACT Government's approach to the procurement and delivery of MyWay+.

Their insight came from leading similar, complex digital ticketing programs including the procurement and delivery of the original Opal ticketing system and its subsequent upgrades, as well as a new road tolling system, and the current procurement of Opal Next Generation. The review conducted by TfNSW officials confirmed the procurement and delivery approach, including risk management, for MyWay+ was sensible and aligned with the experience of the Opal and Opal Next Generation program.

The post implementation review and outcomes of the peer review by TfNSW will be de-briefed to Digital Canberra, who will have future responsibility for large digital procurements, including the risk management of these kinds of procurements (see also [Recommendation 6](#) and [Recommendation 7](#)).

The Minister for Transport will update the Assembly on the outcomes of the post implementation review of MyWay+, including risk management, by the last sitting week of 2026. Reporting on the management of large digital procurements is addressed in the responses to Recommendation 4 and Recommendation 5.

Recommendation 4

The Committee recommends that the ACT Government commence a cross-directorate structured program of internal project management reform, and that a report on this program outlining the specific steps to be taken, as well as the timing of these steps, be presented to the Legislative Assembly within 12 months; and that the Assembly be updated once every 12 months on the implementation of this reform.

Government response

Agreed.

The ACT Government is committed to building a culture of continuous improvement in project management practices, with a strong emphasis on embedding consistent standards across directorates and leveraging lessons learned from recent digital projects.

A whole-of-government program management community of practice commenced in 2024, led by what is now the program and project delivery area of Digital Canberra. This forum has coordinated a schedule of education pieces on ACT Government best practice, supported by industry experts, on topics such as benefits realisation and external assurance practices. The forum is contributing to strengthening alignment and development of core skills and capabilities across government.

The ACT Government is developing a Whole of Government Project Management Framework. The development of the Framework has harnessed our proven project management skills in Infrastructure Canberra, with support from all Directorates, and is in the final stages of development.

The Framework has been developed in partnership with the Australian Institute of Project Management and will deliver a best-practice framework to support transparency, accountability, and strategic alignment across the diverse portfolio of ACT government projects. The Framework will also include a suite of tools and templates to guide ACTPS staff when managing projects, covering planning, governance, risk management, reporting, review and evaluation.

By mid-2024, the ACT's *Best Practice Design and Delivery* guide was updated to provide guidance on best practice project and program management governance, reporting and dedicated multi-disciplinary teams. The significant update to the *Best Practice Design and Delivery* guide supports strengthened governance arrangements by clearly articulating roles and responsibilities and introducing a single point of accountability for each project – establishing the framework for a stronger authorising environment. The forthcoming ACT Government Project Management

Framework will become the underpinning framework for managing projects in ACT. The *Best Practice Design and Delivery* guide sits within this Framework and remains the detailed reference guide for design and delivery of projects with technology components.

Digital Canberra has taken a grass roots approach to embedding *Best Practice Design and Delivery* through providing interactive training sessions via the whole-of-government graduate training program and additional in-depth sessions with key partner areas as requested across 2025.

The establishment of the ACT Government Technology Investment Framework in 2025 is also contributing to improvements in how complex digital projects are planned, governed and assured through a strengthened two-pass investment process that requires initiatives to demonstrate robust end-to-end planning, clear service outcomes, appropriate governance arrangements and a comprehensive understanding of project risks before proceeding to implementation - reducing the likelihood of scope, schedule and delivery failures.

As part of ongoing refinement of the Technology Investment Framework the investment review process that governs how advice is provided to government on proposed investment initiatives has been further strengthened in 2026 through the establishment of a new committee membership model that specifically includes staff with specialist expertise in project management policy and practice, as well as application of Best Practice Design and Delivery principles. The effectiveness of these new arrangements will be reviewed following the 2026–27 Budget, including consideration of whether this assurance process would also have value at other points across the project lifecycle.

The ACT Government agrees it is important appropriate governance and reporting mechanisms are in place to provide meaningful information on project management maturity across the ACTPS. This may be through inclusion in Annual Reports or a suitable, alternative mechanism.

Recommendation 5

The Committee recommends that the ACT Government require that future annual reports of large ACT Government agencies include a section on project management, which highlights the extent to which project deliverables have been achieved on time and within budget, quantifies and explains any delays incurred, and provides sufficient detail to support effective scrutiny by legislative assembly committees.

Government response

Agreed.

Reporting entities are already required to publish information such as original and revised project value and completion dates, and total expenditure to date for projects with budget funding within their capital works program under section “C3 Capital Works” of their annual report.

These requirements are determined through the Annual Reports (Government Agencies) Directions (the Annual Report Directions). The Government will review these requirements to ensure annual reports enable effective scrutiny by the Legislative Assembly on project management.

Digital Canberra was established on 1 July 2025, following the ACTPS Taskforce 2025 Review, to lead all digital and information technology functions across the ACTPS; from 1 July 2026 all new Tier 1 technology projects across the ACT government will be led by Digital Canberra.

Commencing with the 2026-27 financial year, dedicated narrative on project management performance uplift in general and each current Tier 1 technology project will be included in “Part 2B Organisational Overview and Performance” of the Digital Canberra annual report.

Recommendation 6

The Committee recommends that the ACT Government require the cross-directorate structured program of internal project management reform, as per recommendation 4, include a focus on ensuring compliance with accessibility requirements and standards, particularly in relation to projects that are subject to major contract variations that result in changes to delivery schedules.

Government response

Agreed.

The ACT Government is committed to fostering a more inclusive city for people with disability and is continuing to strengthen our approach to removing barriers and enhancing accessibility. This includes delivering projects through best practice principles and governance oversight.

As discussed in the response to [Finding 19](#), the ACT Government agrees with the Committee’s view that future digital transformation programs should ensure accessibility requirements are fully met prior to public launch.

The lessons learnt and capabilities developed through the MyWay+ program will be captured in the development of the above project management framework through an update to the *Best Practice Design and Delivery* guide to ensure accessibility is positioned as a core measure of readiness, particularly for digital transformation projects.

While the *Best Practice Design and Delivery* guide already contains high level guidance on human-centred design, accessibility and testing, the proposed update will place clearer emphasis on how these principles should be applied in practice, and how they can be assured through dedicated testing activities. This will include strengthening guidance on the role of community and user-based testing alongside various types of technology testing, and clearer articulation of the responsibilities of project sponsors and Project Boards in assuring readiness of all project elements prior to launch. The update will be supported by refreshed examples and practical advice to assist project teams to plan end-to-end design and testing activities appropriate to the scale and risk of each initiative. This will help ensure that existing best-practice requirements are

more consistently understood and better applied across government and across different project types.

The ACT Government's procurement framework, strengthened through the 2024 Procurement Reform Program, provides clear policies and guidance to ensure accessibility and inclusion are considered throughout the procurement lifecycle, including when contracts are varied. These requirements are embedded across legislation, the Charter of Procurement Values and supporting guidance, which collectively promote value for money that encompasses social outcomes such as diversity and equal access.

In managing variations, project managers are guided to maintain alignment with original scope, uphold accessibility provisions and ensure decisions remain consistent with established policy settings - reflecting the ACT Government's commitment to inclusive procurement practices and existing robust procurement mechanisms.

The *Best Practice Design and Delivery* guide also includes guidance on how to design human centred products and services that considers accessibility and inclusion requirements from the start of any change. The guide explicitly frames accessibility and inclusion by design as core principles—embedded across discovery, codesign, delivery, testing and evaluation phases. A dedicated section on Accessibility and Inclusion by design defines inclusion as ensuring everyone can participate, with adjustments considered upfront and incorporated into program design from the beginning. Since the release of the 2024 update, use of the *Best Practice Design and Delivery* guide is mandatory for all new Tier 1 initiatives with technology or data components—making accessibility and inclusion by design a requirement, not simply a recommendation.

Recommendation 7

The Committee recommends that the ACT Government produce a manual for best-practice community testing programs for complex projects with important public-facing aspects or functions and that the ACT Government apply these procedures to test all major complex projects.

Government response

Agreed.

The ACT Government apologises to community members who volunteered to participate in the testing of MyWay+ functionality prior to launch, and acknowledges the community-based testing program did not meet expectations, particularly where concerns raised did not result in changes to the system prior to launch MyWay+ on 27 November 2024.

The ACT Government would like to again thank all participants and members of the community who have provided feedback on MyWay+, and reaffirms all feedback provided by participants of the community-based testing program was evaluated by the program and incorporated into a register to inform a program of continual improvements to MyWay+.

Government Response to Report 3 – Inquiry into the procurement and delivery of MyWay+

The ACT Government's *Best Practice Design and Delivery* guide has been in place since 2022 to guide the ACT Public Service in designing human centred products and services. It provides plain English guidance and a range of tools and templates that can assist in the design and delivery of initiatives, including community input and feedback.

Building on the actions outlined elsewhere in this response, the ACT Government will ensure that lessons learned from the MyWay+ program informs further refinement of the *Best Practice Design and Delivery* guide, with a particular focus on strengthening how testing and trialling activities are planned, sequenced and evidenced for complex, public-facing digital initiatives.

At the heart of *Best Practice Design and Delivery* is the Design Wheel, which is a change initiative model to support the successful design and implementation of a change. It has six stages:

- Define the outcome
- Design the change
- Create the change
- Trial, test and refine
- Implement, release, launch
- Evaluate

Best Practice Design and Delivery emphasises that to be able to deliver human centred products and services, we need to understand the user experience and the intended outcome, and then co-design the change. Testing is critical to be able to ensure a change is delivering on its intended outcome as expected – this includes a range of different testing that addresses people, process and technology.

The update will expand existing guidance to more clearly distinguish the complementary roles of technology testing, user acceptance testing and community-based testing, and how each contributes to determining whether a service is fit for operational use prior to public launch. In this context, user acceptance testing is intended to confirm that a solution performs as required against defined business and functional needs in controlled conditions, while community-based testing supports assurance that the service works end-to-end in real-world settings and meets the needs of diverse users.

Within the Design Wheel's 'Trial, test and refine' stage, the updated guidance will emphasise that all forms of testing should be planned early, combine user-focused sessions and technical reviews, and be proportionate to the scale and risk of the initiative. This will be supported by refreshed examples and practical advice to assist project teams, sponsors and Boards to understand what good testing looks like in practice and how evidence from testing should inform decisions about readiness to proceed.

Additionally, Digital Canberra will stand up a new capability that will offer practical assistance and coordination for project teams looking to undertake community-based testing. This will assist to ensure a strong focus on meaningful engagement with community members in alignment with broader government engagement practices. It will support teams by providing

access to shared tools, advice and support for recruiting participants, designing and running testing activities, and capturing and integrating feedback in a consistent way.

Response to Findings

Project Delivery

Finding 1

The Committee finds that the project scope was too large and complex and should have focused on credit and debit card payments, real time passenger information, journey planning functionality, appropriate support services, on-board audio, and retaining previous features such as easy access to account balances.

Government response

The ACT Government notes the finding of the Committee in the context of the Committee's report, which primarily relates to change management for digital transformation programs as discussed in the responses to [Finding 4](#) and [Finding 5](#).

The commentary in this finding related to account balances is addressed in the Government response to [Recommendation 1](#).

Finding 2

The Committee finds that the change to a single-phase delivery was a poor decision. This led to a lack of clarity on project milestones, and unclear timing for when these milestones were to be delivered.

Government response

The ACT Government notes the finding of the Committee.

The decision to proceed with a single-phase, rather than the original multi-phase, Transition In Plan was predicated on the reasons outlined under "Project Delivery - Transition in planning" of the [Government submission](#), being the anticipated decommissioning of the Optus 3G Network, which would have rendered the existing ticketing, MyWay, and telemetry, NXTBUS, systems inoperable.

Running the old and new systems in parallel for an extended period (until the shut off) as proposed in the original, multi-phase Transition In Plan would have caused confusion amongst bus users and in communicating ways to pay, thus would have risked public confidence.

Noting the above constraints, the Government agrees that that the project would have benefited from a longer implementation timeframe to conduct better user testing, iron out bugs and communicate a phased approach starting with a minimal viable product.

Finding 3

The Committee finds that the community testing of MyWay+ was undertaken so poorly that it was almost meaningless and does not appear to have had any impact that improved the rollout of the system.

Government response

The ACT Government notes the finding of the Committee.

The MyWay+ program team continue to work with NEC to refine the MyWay+ system through an ongoing program of updates. Feedback provided by participants of the community-based testing program was evaluated and incorporated into a register which continues to inform improvements being delivered through this update program. A summary status of improvements (as at April 2025) made in response to feedback from the Community Based Testing program is was provided to the Committee in the response to [QTON 03](#).

The ACT Government will ensure that lessons learnt from MyWay+ related to the role of community-based testing for digital transformation projects, are systematically incorporated into ACT Government Project Management Framework so that they are available to all project managers across the ACTPS (see [Recommendation 7](#)).

Finding 4

The Committee finds that the ACT Government lost the trust of public transport users by promising basic features, like real-time tracking, that were not delivered at launch.

Government response

The ACT Government notes the finding of the Committee which was acknowledged by the Minister for Transport during the Inquiry, as referenced in the report:

“Communicating about it being a minimum viable product rather than delivering every single thing that people expected of a new ticketing system all at once would have been a better approach, and that [more] work would need to be done on some of the elements of the system...”

The ACT Government will place emphasis on this aspect of the lessons learnt through the MyWay+ program for future digital transformation projects, which is discussed in the response to recommendations from this Inquiry.

Finding 5

The Committee finds that the MyWay+ communications strategy should have provided simple, useful information such as how to use MyWay+ by tapping on and off with a credit or debit card.

Government response

The ACT Government notes the finding of the Committee and acknowledges implementing a change of this scale can be challenging and adoption of new technology and behaviour change within the community takes time. Recognising this, Transport Canberra developed and delivered a comprehensive communications and engagement program to support Canberrans through the transition to MyWay+, including “how-to” guides and instructional videos for tapping on and off with credit or debit cards.

Finding 6

The Committee finds that MyWay+ was clearly not ready for launch on 27 November 2024 and that multiple stakeholders had pointed this out to the ACT Government and officials. The decision to launch anyway on that date was clearly flawed.

Government response

The ACT Government notes the finding of the Committee and acknowledges that concerns raised by other parties should have been examined further and given additional weight when considered against the advice from NEC Australia that MyWay+ was ready for launch on 27 November 2024.

This is discussed further in the responses to [Finding 6](#), [Finding 19](#) and [Finding 20](#).

Finding 7

The Committee finds that the concept of minimum viable product needed to be defined at the point where the transition plan was changed, and that the lack of a clear definition and shared understanding of minimum viable product with NEC led to problems in the later stages of the delivery process.

Government response

The ACT Government notes the finding of the Committee and acknowledges defining the minimal viable product sooner would have allowed for more streamlined communications (see also responses to [Finding 4](#) and [Finding 5](#)).

Launch

Finding 8

The Committee finds that poor project management led to an undersupply of MyWay+ cards and retailers, despite the ACT Government being told by stakeholders that access to cards was important

Government response

The ACT Government notes the finding of the Committee and acknowledges physical card distribution arrangements were not sufficiently scaled or resilient ahead of launch, particularly for customers who cannot readily rely on digital channels.

An outline of the actions undertaken by the ACT Government, NEC and distribution partners immediately following launch to increase card quantities, expand retailer participation and stabilise availability was provided in the [Government Submission to the Inquiry](#).

MyWay+ cards can currently be purchased and “topped up” at 51 retail outlets across Canberra, compared to the 46 MyWay retail outlets under the previous system.

Finding 9

The Committee finds that MyWay+ accounts, the app and website were poorly designed and did not work properly.

Government response

The ACT Government notes the Committee’s findings regarding the initial performance, usability and design of the MyWay+ account, mobile application and customer portal, and acknowledges many users experienced frustration following launch.

NEC acknowledged that there were usability issues that negatively affected customers, including seniors and concessional users, and that instability and complexity in the early period reduced confidence in the digital channels.

The MyWay+ mobile application is based on a multi-modal Mobility-as-a-Service (MaaS) platform used in multiple jurisdictions and designed to support a wide range of transport modes. Some user experience challenges arose from this multi-modal design, including default settings that were not initially optimised for bus and light rail-only use, as well as from users’ unfamiliarity with a new application.

In addition, the introduction of Digital Account authentication and associated security controls required additional authentication steps. These controls were implemented to meet security and identity requirements, however, it’s acknowledged these created usability challenges, particularly where account management functions transitioned between the app and the customer portal.

The ACT Government recognises the combined impact of the multi-modal application design and Digital Account authentication introduced more complexity for some users at launch than anticipated, and the community’s transition to MyWay+ would have benefitted from more simplistic customer-facing workflows.

Further discussion specific to the accessibility of the MyWay+ customer portal and mobile app is provided at [Finding 19](#).

More broadly, Transport Canberra continues to work closely with NEC to refine the MyWay+ customer portal (i.e. website version) and mobile application in response to customer feedback as new features are released, primarily focussed on accessibility, usability and security; this is supported over the life of the contract as stipulated under Quality Assurance and Continuous Improvement clauses.

These improvements implemented through a schedule of software releases to the customer portal, occurring as frequently as fortnightly with version releases for the mobile application as needed, usually half-yearly. As a recent example, the software version released early February 2026 made improvements to the “Buy MyWay+ Card” and “Quick Top-Up” features, and on-screen notifications within the customer portal in response to customer feedback.

The ACT Government will implement lessons learned through the MyWay+ program to improve the design and testing of public interfaces for future digital transformation projects, as discussed in the ACT Government response to [Recommendation 7](#).

Finding 10

The Committee finds that group accounts are a core feature for families and are essential to ensure that children can catch the bus and these should have been operational on launch day.

Government response

The ACT Government notes the finding of the Committee and acknowledges the ability to manage multiple cards within a single account is an important capability for families, carers and community organisations, and recognises the impact on users where this functionality was not available at launch.

Two new features were proposed to be introduced for customers with the implementation of MyWay+:

- Group Accounts – allowing users to link secondary accounts to their main account, centralising payment management and travel history.
- Institutional Accounts – similar to Group Accounts, allowing institutions (e.g. schools, charities and other organisations) to generate on-demand tickets for other passengers through a main account.

Initial delay to the delivery of these functionalities was influenced by broader program dependencies, including the introduction of the ACT Government Digital Account after procurement, which added complexity to the design and implementation of linked and dependent accounts; Transport Canberra and NEC agreed to progress the implementation of group accounts post-launch enhancement.

In this context, it was initially communicated to the Committee and broader community the group feature was undergoing testing and would be available in the first quarter of 2025. Availability was delayed further in order to address web accessibility improvements identified through the review by Get Skilled Access (see [Finding 19](#)), particularly customer-facing elements, as noted in the [ACT Government’s supplementary submission to the Inquiry](#).

Subsequently, and particularly given the issues experienced with other elements of the MyWay+ customer portal and app at launch, Transport Canberra decided to undertake a deeper review into the design and testing of these functionalities to ensure they provide a good customer

experience. As a result, Transport Canberra requesting redevelopment of the functionality as initially customers would have had to go through several steps to identify, invite and accept users into a group account, which was considered to not represent a user-friendly process.

A second proof of concept has been demonstrated to Transport Canberra which improves the sign-up process, and is being progressed to testing prior to the feature becoming available, expected mid-2026.

Notwithstanding the above, the ACT Government agrees future digital transformation programs should ensure critical family and dependent use cases are, where practicable, available at launch.

Finding 11

The Committee finds that the decision to launch MyWay+ without providing proper coverage and access to ticket machines was flawed.

Government response

The ACT Government notes the finding of the Committee and acknowledges the frustration experienced by some passengers due to the unavailability of ticket vending machines (TVM) at the time of the MyWay+ launch. The delay to the installation and commissioning of the TVMs was recognised in the [Government's Submission](#) and [Supplementary Submission to the Inquiry](#).

All 26 MyWay+ TVMs, which directly replaced the MyWay TVMs at light rail stops, major transport interchanges and the Canberra Airport, have been operational since September 2025 and reliability data is published on the [Transport Canberra website](#).

Finding 12

The Committee finds that offering a QR code payment option on a busy public transport system was a questionable choice showing poor judgment and that the QR code available at launch performed extremely poorly.

Government response

The Government notes the finding of the Committee and acknowledges the evidence presented to the Committee regarding the usability and operational challenges associated with in-app MyWay+ Pass (QR code) ticketing at launch, and the negative impact this had on user confidence, particularly in high-throughput environments.

Since launch, MyWay+ has enabled users to pay for public transport using their credit or debit for the first time, including through credit or debit cards stored in Apple and Google's digital 'wallets' on their smart phone or smart device using near field communication (NFC) technology.

QR-based mobile ticketing is a well-established, globally adopted approach in metro and city transport systems across Asia, Europe and the United States, where it is commonly used as a complementary option alongside traditional transport cards and contactless EMV payments. Its inclusion in MyWay+ aligned with international practice and was intended to provide an

additional mobile-first option for account holders and occasional travellers. However, the ACT Government recognises QR codes represent the least preferred payment method in MyWay+ (approximately 6% of January 2026).

A number of improvements to the QR code and in-built readers on validators were made between launch and March 2025 to improve, as best possible, the scanning performance of the QR code. The [Government Submission](#) and [Supplementary Submission to the Inquiry](#) outlines these actions, including system configuration, clearer validator cues providing audible and visual confirmation, and stronger customer education, and the Committee's Report notes several technical issues were subsequently resolved or materially improved shortly after launch, and further refinements continue.

Transport Canberra is currently in discussion with NEC and third parties regarding expanded functionality available through MyWay+ to further streamline payments for public transport. This includes:

- **Enabling MyWay+ account “top-ups” using Google Pay and Apple Pay** through the implementation of payment option through the MyWay+ customer portal (implementation underway).
- **Apple Wallet “Express mode”** which would allow NFC payments for transport without having to wake or unlock a device; Google Wallet already allows users to pay using NFC without the need to unlock their device. This has been trialled by TransPerth in an Australian first and will be implemented in MyWay+ following localised testing (planned).
- **Digital MyWay+ Card** which would use a digital, NFC MyWay+ token (card) that can be saved in the users Apple or Google wallet, and operate similar to credit/debit cards with fares deducted from the user's linked MyWay+ account when tapping on and off. A similar technology has been implemented by Public Transport Victoria, with the digital “Myki” card, and is being considered as an alternative to the QR code within MyWay+ (proposed, under investigation).

This represents a normal evolution toward global best practice, which is stipulated under Innovation and Continuous Improvement clauses in the supply of goods and service under the contract, which may replace the QR code in the future. Transport Canberra will also continue to provide customer education materials to assist passengers with using the QR code.

Finding 13

The Committee notes that despite clear feedback from stakeholders and members of the public, the ACT Government failed to provide services and information that met the needs of senior Canberrans.

Government response

The ACT Government notes the findings of the Committee and acknowledges some members of the senior community experienced difficulties with the transition to MyWay+.

Senior Canberrans were identified very early on as a critical and sensitive stakeholder group in the MyWay+ Program communication and engagement strategy. The targeted communication to senior Canberrans was developed in collaboration with the Office for Seniors and Veterans in the Community Services Directorate and through formal engagement with the Council of the Ageing (COTA).

Transport Canberra undertook extensive engagement activities with COTA ACT and senior members of the community ahead of MyWay+ launching as outlined in the [Government Submission to the Inquiry](#). Post-launch, members of the Transport Canberra team attended weekly, in-person sessions alongside COTA ACT at ACT libraries, and co-ordinated alongside COTA two, senior specific “help sessions” at the ACT Government building in Dickson in November and December 2024 to provide 1-on-1 assistance in using MyWay+. The ACT Government also funded flyers and factsheets to be distributed to seniors through COTA ACT’s mailing list.

Finding 14

The Committee finds that the rollout of MyWay+ had a significant impact on bus drivers, and thanks them for their service.

Government response

The ACT Government notes the finding of the Committee and appreciates the acknowledgement of the service of bus drivers.

Bus drivers are a well-respected cohort of Transport Canberra Operations who, like the Transport Canberra Customer Experience team, play an essential role in supporting members of the community in navigating any changes to our public transport system.

The MyWay+ program team continue to work with NEC to refine the MyWay+ system through an ongoing program of updates. Feedback provided by drivers continues to be evaluated and incorporated into a register to inform improvements being delivered to the system. A summary status of improvements made to the system (as at April 2025) in response to feedback received from drivers was also provided to the Committee in the response to [QTON 03](#).

Finding 15

The Committee finds that the ACT Government should have taken a more proactive and genuine approach in acknowledging the many flaws and faults in this project.

Government response

The ACT Government notes the finding of the Committee in the context of the report, which primarily relates to the tone of communications immediately after launch, rather than the level of public engagement, or availability and regularity of updates to the community from the ACT Government.

Other comments and findings

Finding 16

The Committee finds that the MyWay+ project demonstrates a significant lack of appropriate risk management practices within Transport Canberra.

Government response

The ACT Government notes the finding of the Committee.

The ACT Government has engaged with the Inquiry in good faith and has provided detailed information on risk management by the program to the Committee. This included risk registers for the program, and its various streams and projects, through evidence and in response to questions taken on notice and questions on notice (as summarised in the response to [QTON 34](#)).

The ACT Government has committed to conduct an internal review of the MyWay+ project, including risk management, and implement changes to improve how risks are managed and mitigated in large digital procurements, as discussed in the Government response to [Recommendation 3](#).

Finding 17

The Committee finds that the MyWay+ project constitutes a significant failure to effectively manage a complex digital project and comes in the context of a series of digital projects that have been poorly managed and delivered by the ACT Government.

Government response

The ACT Government notes the finding of the Committee.

Digital transformation programs are innately complex, and each program is unique when it comes to their design, delivery and challenges which may arise in the lead up to and after implementation.

In recognition of this complexity, the ACT Government has established Digital Canberra as a central capability for digital, data and technology who will consider the lessons learnt through the MyWay+ program in delivering a structured program of reform for the management of digital projects (see [Recommendation 3](#), [Recommendation 4](#), [Recommendation 6](#) and [Recommendation 7](#)).

Finding 18

The Committee finds that there was insufficient transparency regarding the costs of the MyWay+ project which hindered its ability to determine whether the project was delivered within budget, and the financial implications of lost revenue.

Government response

The ACT Government notes the finding of the Committee.

The ACT Government has engaged with the Inquiry in good faith, and has provided detailed and extensive information to the Committee through submissions, evidence given during hearings, and in responses to questions taken on notice and questions on notice, including on sensitive matters, such as contract management, where appropriate.

All possible commercial elements that were not in confidence were disclosed to the Committee, including that confirmation that the transition component of the contract was operating within the funding envelope from the publicly disclosed value of the MyWay+ procurement available on the ACT Government contract register. The project and operations continues to be delivered within the funding envelope.

With regards to revenue, public transport fare revenue for the 2024-25 financial year, including concession revenue claimed from the Chief Minister, Treasury and Economic Development Directorate (CMTEDD) was published in the [Transport Canberra and City Services Directorate \(TCCS\) Annual Report](#).

Passenger boardings, being an associated reporting metric, for the period of 1 July 2025 – 31 December 2025 is published in the Transport Canberra Operations Half Yearly Statement of Performance which was tabled in the Assembly during the first sitting week of 2026.

Passenger boardings were reported using transactional-level MyWay+ data (i.e. “tap-on”, fare categories and revenue) and represent the combined total of both bus and light rail services. As outlined in the explanatory notes:

“Lower than target recorded boardings reflect a combination of system transition and policy settings rather than reduced service availability. Differences in boarding business rules between the MyWay+ system and the superseded MyWay system have resulted in a more conservative approach to patronage counting. In addition, fare free initiatives, such as Fare Free Fridays, reduced the incentive for passengers to tap on when travel was free, resulting in recorded patronage rather than total passenger movements. A small number of buses approaching end of life, and later retired, were not equipped with MyWay+, limiting the ability to capture boardings during the reporting period.”

As outlined in the [statement by Minister for Transport in response to the order to table documents \(MyWay+\) on 4 February 2026](#), the ACT Government and NEC Australia are working to reinstate public transport reporting using MyWay+ data on the ACT Government’s Open Data Portal.

Finding 19

The Committee finds that MyWay+'s non-compliance with accessibility requirements has failed the ACT community, in particular people living with disabilities.

Government response

The Government notes the finding of the Committee.

Accessibility is a fundamental consideration for public transport systems, and the ACT Government acknowledges MyWay+ did not meet the Government's or community's expectation at the time of launch, and that some members of the community, including people living with disabilities, experienced difficulties using the system.

The Government apologises to Canberrans who faced barriers accessing the system.

Whilst accessibility requirements were part of the ACT Government's contract with NEC, we recognised that too much reliance was placed on the assumption the contractor would satisfy the system requirement for web accessibility as stated in the contract, and the Government did not validate or seek appropriate assurance that this requirement had been met prior to go-live (responses to [QTON 001](#) and [QTON 19](#)).

The ACT Government agrees with the Committee's view that future digital transformation programs should ensure accessibility requirements are fully met prior to public launch. Through the lessons learnt from the MyWay+ program, accessibility will be positioned as a core measure of readiness in relevant project management frameworks, as discussed in the response to [Recommendation 7](#).

As outlined in the response QTON 1, including the [attached letter](#), the key action undertaken by the ACT Government and NEC to improve accessibility following launch was the engagement of Get Skilled Access (GSA) to undertake a comprehensive accessibility review of the MyWay+ systems, including Transport Canberra websites.

The requirement for the MyWay+ account portal (website) and mobile app to achieve at least level AA, as the minimum level of conformance, with the current W3C Web Content Accessibility Guidelines 2.0 (WCAG 2.1 Guidelines) across device types, is one of several user accessibility requirements stipulated in the contract with NEC Australia for the provision of the Next Generation Ticketing System for Transport Canberra (MyWay+). However, WCAG 2.1 acknowledges that even in instances where web content may satisfy all success criteria, it may not always be usable by people with a wide variety of disabilities, therefore recommend usability testing.

The first stage of the review by GSA focussed on the "technical conformance" of the MyWay+ system, including all NEC deliverables (i.e. equipment and installations, the MyWay+ portal and mobile app) against content accessibility requirements. An update on actions taken as of June 2025 to improve technical conformance during this stage of the review was provided in the response to [QTON 33](#) of the Inquiry.

GSA then evaluated the broader customer journey using MyWay+, or “real-world usability”, by engaging a diverse cohort, similar to the Community Based Testing program, of people with a disability who are able to provide a user-based assessment of MyWay+ and inform further, more nuanced improvements, to the system to support an accessible end-to-end experience.

The results of this initial review by GSA into both the conformance and usability of MyWay+ were reported in the *MyWay+ Accessibility Evaluation Briefing 30/09/2025*, which is provided at Attachment A of this response. The review concluded:

“...the MyWay+ platform demonstrates strong performance in terms of usability, accessibility, and user satisfaction.

The intuitive layout, efficient navigation, and clean design contribute to a positive user experience, particularly for new users.

However, targeted improvements in interaction design, notification visibility, and accessibility features such as font size and input options could further enhance the platform’s effectiveness and inclusivity.

These findings provide a clear roadmap for iterative design enhancements that align with user requirements and expectations.”

The results of the technical conformance testing found:

“The conformance evaluation identified that NEC had implemented a range of improvements since the previous evaluation.

That said, it was also identified that a series of design and coding features implemented throughout MyWay+ do not currently conform with the relevant WCAG success criteria.”

In response to these findings, and additional advice provided by GSA in December 2025, NEC initiated a further, structured remediation program to address outstanding technical conformance. These corrective actions have been implemented in parallel with improvements to real-world usability through a schedule of releases, occurring as frequently as fortnightly, since October 2025.

A summary of the corrective actions and improvements implemented to date is provided in the letter from NEC Australia dated 23 February 2026 included at Attachment B. Unfortunately, the letter from NEC advises there are eight out of 48 applicable conformance elements still being addressed by NEC are directly related to the technical conformance (Level AA conformance) required of the MyWay+ customer portal. This does not affect the mobile application which continues to maintain the required level of conformance.

Details of the status, user impact and corrective actions for each of these conformance elements as at 20 February 2026 is provided at Attachment C. The ACT Government would like to state its disappointment the MyWay+ system has still not met the expected level of conformance as defined in the Statement of Work under Schedule 2 of the contract.

Through these process, the program has gained greater understanding and knowledge of delivering public goods and services which are accessible, usable and can respond to the ever-evolving needs of the community. This has been applied to other elements of MyWay+ such as the Group Accounts (see [Finding 10](#)) and QR codes (see [Finding 12](#)).

The ACT Government will ensure these capabilities developed through the MyWay+ program are captured in the relevant project management frameworks, as discussed in the responses to [Recommendation 4](#) and [Recommendation 6](#).

Finding 20

The Committee finds that the MyWay+ project testing process was flawed and unable to contribute useful information that would have effectively informed the project team about the readiness of the system.

Government response

The ACT Government notes the finding of the Committee in the context of the report, which primarily relates to community-based testing (see [Finding 3](#) and [Finding 20](#)).

The Government notes the community-based testing program only represents one element of testing performed prior to the launch of MyWay+ as outlined under “Project Delivery – System development, integration and testing” of the [Government submission](#). Notwithstanding, the ACT Government recognises the extent of testing and validation undertaken did not provide the level of assurance ordinarily expected to inform decisions regarding the system readiness for public launch (see also the response to [Finding 6](#) and [Finding 19](#)).

Transport Canberra has since worked with NEC to strengthen testing, validation and assurance practices.

Testing of the journey planner functions ahead of the commencement of the updated “construction” bus network on 2 February 2026 provides a recent example of where independent testing and validation by Transport Canberra resulted in the prompt identification, escalation and rectification of an issue with a public facing element of MyWay+, as well as further pre-emptive measures to be implemented in the management of the contract.

Bus network, including timetable, data files are transmitted from the Transport HASTUS network planning tool to NEC via the Digital Canberra tool “MuleSoft”, which transforms and moves the file between systems. NEC then loads the transformed file into the MyWay+ Transport Management System (MyWay+ TMS) which is then pushed into the General Transit Feed Specification (GTFS) data feed which third party vendors, such as Skedgo, can connect to for use in their journey planning platforms, including the Journey Planner on the MyWay+ app and Transport Canberra website.

Although NEC runs an integration environment which is designed to test third party integrations into the NEC systems, such as the MyWay+ TMS, it is not currently designed for testing new networks and related output data validation. Essentially, the integration environment provides

visibility of whether data has been successfully exported from the MyWay+ TMS, though does not “test” (provide visibility of) the output of exported data received into a third-party vendor’s platform.

Ahead of the updated construction timetable commencing, Transport Canberra conducted due diligence testing of Journey Planner platforms on 30 January 2026 and identified this network’s data was not presenting in the MyWay+ TMS. The “break” in the aforementioned transmission sequence was identified as occurring at the MuleSoft tool. This issue was rectified by the following day, and the network file re-progressed through the “chain” to NEC.

On 1 February, Transport Canberra checked the MyWay+ TMS to confirm the presence of the updated network data. It was not present, however, NEC provided evidence the data was still loading into the MyWay+ which was expected to be completed overnight. This occurred at 1:00 am on 2 February, Transport Canberra then forced a refresh of the GTFS data feed.

As the Journey Planner is “further down the chain”, testing of these could not occur until the file was available in the MyWay+ TMS and subsequently integrated into third-party platforms. This testing was able to occur at 3:00 am on Monday 2 February, at which point Transport Canberra identified information in the Journey Planner continued to incorrectly display the previous network information.

Current network and timetable information became available on third-party platforms Google maps and NextThere at approximately 10:30 am on Monday 2 February, which suggested the issue with the information in the Journey Planner was occurring downstream of the GTFS data feed (i.e. within the Skedgo platform). This was escalated with NEC who addressed this directly with Skedgo and the issue was resolved by approximately 3:00 pm on the Monday, with correct network and timetable data being shown in the Journey Planner.

The City and Environment Directorate, including Transport Canberra, will conduct a post-incident review with NEC to determine agreed measures which will be implemented to improve the validation and assurance of outputs for future network updates. This will consider process changes, evidence required to demonstrate activity undertaken and status check-ins.

Transport Canberra and Digital CBR are working together to review HASTUS files against MuleSoft parameters, and update those which conflict. Transport Canberra has also approached Digital CBR to request increased access for the Public Transport Systems Director to have increased access and functionality within MuleSoft to assist with the remedy of any Transport Canberra data related issues.

Finding 21

The Committee finds that there was a failure of management over the MyWay+ project and that its delivery structure was not sufficient to provide internal oversight and identify key concerns in relation to the delivery schedule.

Government response

The ACT Government notes the finding of the Committee.

The staff resources employed on the MyWay+ program were based on available funding and the project governance arrangements, as outlined in the [Government Submission](#), were in line with industry and government best practice program management delivery and governance, such as the UK Government's PRINCE2 and Managing Successful Programmes (MSP) frameworks. Further commentary is provided in the Government response to Recommendation 4.

Finding 22

The Committee finds that Transport Canberra officials failed to take the security vulnerabilities and data breaches reported by members of the public seriously and repeatedly told the Committee that there was no basis for these concerns despite clear evidence to the contrary.

Government response

The ACT Government notes the finding of the Committee.

ACT Government officials have engaged with the Inquiry in good faith, providing detailed and extensive information to the Committee through submissions, evidence given during in-camera and public hearings, and in responses to questions taken on notice and questions on notice, including on sensitive matters, such as cybersecurity, where appropriate. The [Minister for Transport also provided an update to the Assembly on 10 April 2025](#), supplementary to the question without notice from Mr Braddock on 9 April 2025 regarding vulnerabilities reported to the Inquiry.

The ACT Government takes cyber security seriously and is committed to ensuring the security and integrity of our systems and data. While every effort is made to keep our systems secure, cyber security threats are ever-present and vulnerabilities may still exist or arise without notice.

We take seriously all reports from members of the public and recognise the value of responsible disclosures in helping to identify and rapidly address vulnerabilities.

That is why the ACT Government has a Vulnerability Disclosure Program in place which allows people to responsibly share their findings if they think they've identified a vulnerability in any of the government's systems.

All responsible disclosures regarding the MyWay+ system have been responded to by the program in accordance with the ACT Government Cyber Security Policy. As a recent example, Transport Canberra was notified of a possible cyber vulnerability regarding MyWay+, which was responsibly reported to the ACT Cyber Security Centre, on 4 February 2026, who subsequently notified NEC within minutes. NEC immediately commenced investigations in response to the notification, and confirmed there had been no breach of personal, private or financially sensitive data. Appropriate treatments were commenced in accordance with the Cyber Security Policy within a day of notification.

Government Response to Report 3 – Inquiry into the procurement and delivery of MyWay+

The Vulnerability Disclosure Program complements a program of assurance testing, including penetration testing, of MyWay+ which is conducted on a quarterly basis by an independent and external cyber security assurer engaged by NEC; this was last undertaken in December 2025 and will next occur in March 2026.

Augmenting NEC's testing, as part of maintaining compliance with the Payment Card Industry Data Security Standard (PCI DSS) the City and Environment Directorate (CED) has also engaged a different, independent and external cyber security assurance firm to conduct security assurance, including penetration testing, of MyWay+ on a monthly basis.

**MyWay+ Accessibility
Evaluation Briefing
30/9/2025**



Introduction

The Australian Human Rights Commission (AHRC) [advises](#) that a digital good or service created for people to consume, engage with and/or control should be designed to deliver equal access. This means it provides features that enable a person with disability to complete the tasks they need to, just like any other user. Digital inclusion is fundamental to ensuring that all individuals—regardless of ability—can participate fully in society.

For platforms like MyWay+, which serve a wide and diverse user base, accessibility is not just a technical requirement but a cornerstone of equitable service delivery.

Recognising this, NEC has actively worked to improve access, implementing changes and enhancements in response to previous accessibility evaluations.

This current assessment builds on that foundation, providing a comprehensive evaluation of MyWay+ through two complementary lenses: technical conformance to accessibility standards and real-world usability testing with people with disabilities.

Together, these approaches offer a robust understanding of how well MyWay+ supports inclusive digital experiences and where further improvements can be made.

This summary discusses the high-level findings of an evaluation undertaken during the period of 12th – 30th September 2025 to determine the extent to which MyWay+ delivers equal access of use.

How is equal access assessed?

There are two complementary parts to assessing equal access.

- Part A is a conformance evaluation that determines how well web pages or applications meet accessibility standards.
- Part B relates to real-world testing of the product with a diverse range of people with disability to confirm how usable the product actually is.

How was the evaluation conducted?

Part A: Conformance evaluation

Conformance to a standard means that a digital good or service meets or satisfies the 'requirements' of the standard.

MyWay+ was evaluated against the Australian Standard on Accessibility requirements for ICT products and services ([AS EN 301 549](#)). This standard uses the success criteria set out in the World Wide Web Consortium's (W3C) Web

Content Accessibility Guidelines (WCAG) as the 'requirements' or measure of success.

In line with W3C advice, the conformance evaluation was conducted by an accessibility specialist using a balance of semi-automated evaluation tools combined with rigorous manual testing. Manual testing involved visual review of code, as well as testing using a keyboard and assistive technology under different device settings.

As part of the evaluation, discussions were also held with NEC staff about their methods and processes they use, as well as a review of documentation demonstrating the action and testing NEC had taken in response to accessibility issues identified in an earlier evaluation undertaken during the period of 5th – 28th May 2025.

Part B: User testing

User testing was conducted through structured one-on-one sessions with a diverse group of participants, including individuals with a range of disabilities and assistive technology requirements. Testing was carried out on participants' personal mobile phones and computers to replicate real-world conditions and ensure authentic interaction with the MyWay+ platform.

Participants were guided through a series of tasks designed to assess usability and accessibility. Verbal feedback was collected throughout the sessions, and facilitators recorded observational notes on user interactions, challenges, and behaviours. Accessibility was evaluated using the Vivo Functional Assessment Likert Scale, which ranks user experience based on five levels of functional independence:

1. Can access and use independently with ease
2. Can access and use independently with moderate effort
3. Can access and use independently with maximum effort
4. Requires assistance to access or use
5. Access or use is not possible

In addition to task-based ratings, the In Vivo Functional Inclusion Tool was used to assess each feature across four qualitative dimensions: ease of use, confidence, dignity, and satisfaction. This tool enabled a deeper understanding of how users experience the platform beyond basic functionality, capturing emotional and experiential aspects of inclusion.

The participant cohort included ten people from Victoria, New South Wales, and the ACT, representing both regular and first-time MyWay+ users. Disabilities represented included Blind and low vision, intellectual disability, autism, cerebral palsy, dyslexia, and spinal muscular atrophy. Assistive technologies used ranged from screen readers and magnifiers to eye gaze systems and zoom functions. Participants' technology proficiency ranged from low to experienced.

This inclusive and multi-dimensional methodology provided a robust evidence base for evaluating the platform's accessibility and usability, ensuring that findings reflect the lived experiences of users with diverse access needs.

What were the results?

It is important to note that a digital good or service can achieve technical conformance and still have usability problems. Similarly, a product can still have technical limitations but still be usable.

Conclusion

In conclusion, the MyWay+ platform demonstrates strong performance in terms of usability, accessibility, and user satisfaction.

The intuitive layout, efficient navigation, and clean design contribute to a positive user experience, particularly for new users.

However, targeted improvements in interaction design, notification visibility, and accessibility features such as font size and input options could further enhance the platform's effectiveness and inclusivity.

These findings provide a clear roadmap for iterative design enhancements that align with user requirements and expectations.

Results of conformance testing

The conformance evaluation identified that NEC had implemented a range of improvements since the previous evaluation.

That said, it was also identified that a series of design and coding features implemented throughout MyWay+ do not currently conform with the relevant WCAG success criteria.

Those issues currently preclude MyWay+ from completely conforming with the Australian Standard and delivering equal access.

The success criteria that MyWay+ still need to meet are outlined in the section, 'How can MyWay+ continue to improve?'

Results of user testing

Extensive user research was conducted to assess the usability, accessibility, and overall user experience of the MyWay+ platform. The study engaged a diverse group of participants, including both new and experienced users, to ensure a well-rounded evaluation across varying levels of familiarity.

The findings indicate a strong overall reception, with users describing the platform as intuitive, efficient, and well-designed for everyday use. The platform scored an average accessibility rating of 1.8 from users, positioning it between *“can access and use independently with ease”* and *“can access and use independently with moderate effort.”*

This reflects a high level of usability, with most users able to navigate and interact with the platform confidently and independently.

These results affirm MyWay+’s commitment to delivering a user-centric experience and highlight opportunities for further refinement to enhance accessibility for all user segments.

One of the most prominent strengths identified was the clarity and simplicity of the layout. Users repeatedly emphasised that the interface was straightforward and easy to navigate, with the home page serving as a central hub for all critical information.

This design choice significantly reduced cognitive load and allowed users to quickly access essential features such as account balance, top-up options, and concession status. The ability to view these elements at a glance was particularly appreciated by users who rely on the platform for frequent transactions and verification purposes.

New users reported a notably smooth onboarding experience, indicating that they were able to become comfortable with the platform in a short period of time. This suggests that the design effectively supports learnability, minimising the need for external guidance or training.

The clean and uncluttered interface was cited as a key factor in reducing the margin for error, which is especially important for users who may be less familiar with digital systems or who require accessible design features.

Efficiency in navigation was another recurring theme in the feedback. Users valued the placement of frequently used options directly on the home screen, which minimised the number of clicks required to complete common tasks.

The logical arrangement of features—where elements appeared in places users intuitively expected—contributed to a seamless and satisfying experience. The absence of visual clutter further enhanced usability, allowing users to focus on their goals without distraction.

Despite these strengths, several areas for improvement were identified through the research. A common topic arose during the card purchasing process, where users often failed to notice the "+" icon required to increase the quantity of cards. This interaction pattern suggests a need for clearer visual cues or instructional prompts to guide users through the process.

Additionally, pop-up notifications located in the top right corner of the screen were frequently missed, particularly when users were zoomed in on desktop or mobile devices. This points to a visibility and responsiveness barrier that could be addressed through repositioning or redesigning notification elements.

Font size was another area of concern, with multiple users requesting an increase to improve readability across various screen sizes and resolutions. This feedback highlights the importance of accommodating users with different visual requirements and ensuring that text remains legible in all contexts.

Furthermore, users expressed a desire for more dropdown box options throughout the platform, which could streamline input processes and reduce the need for manual entry.

How can MyWay+ continue to improve?

The identified issues need to be resolved so MyWay+ can conform with the Australian Standard and deliver equal access.

It is recommended that a remediation plan be implemented to resolve those errors as well as ensure no new errors inadvertently occur.

The plan should concentrate on repairs to high-impact elements that appear on multiple pages, and/or are critical to complete key tasks.

Focus on resolving WCAG conformance errors related to the following success criteria:

Focus on resolving WCAG conformance errors related to the following success criteria: This can be achieved through:

- 1.1.1 Non-text Content
- 1.3.1 Info and Relationships
- 1.3.3 Sensory Characteristics
- 1.4.1 Use of Colour
- 1.4.3 Contrast (Minimum)
- 1.4.4 Resize Text
- 1.4.10 Reflow.
- 2.4.1 Bypass Blocks
- 2.4.7 Focus Visible
- 2.5.3 Label in Name
- 3.2.2 On Input
- 3.3.2 Labels or Instructions
- 4.1.2 Name, Role, Value
- Improving colour contrast.
- Associating appropriate labels with every form control.
- Including alternative text for all images
- Using mark-up to convey meaning and structure.
- Helping users avoid and correct mistakes.
- Reflecting the reading in the code order.
- Providing meaning for non-standard interactive elements through targeted use of ARIA.

Mark White

City and Environment Directorate (CED)

GPO Box 158, Canberra ACT 2601

<via email>

Monday, February 23, 2026

Subject: MyWay+ Accessibility and Usability – Status Update and Forward Plan

Dear Mark,

I am writing to provide a formal update on the status of accessibility remediation for the MyWay+ customer portal, together with our plan to complete the remaining items and move to reassessment.

NEC remains fully committed to ensuring the MyWay+ customer portal and other key points of customer interaction meets accessibility requirements and provides an inclusive and usable experience for all customers.

Following the initial accessibility assessment and subsequent further feedback from GSA in December, NEC initiated a further structured remediation program to address technical WCAG compliance which is well progressed. In parallel, additional usability testing was commissioned to ensure that improvements address real-world customer experience.

Examples of the remediations is provided with this update, and the details are summarised as follows:

Customer Portal Progress to Date

The most recent accessibility assessment by GSA identified 295 actions. Of these:

- 265 actions have been completed and deployed
- 30 actions remain open

NEC testing has identified two additional remediations required, affecting 5 pages.

Version 2.1.0 was deployed to production on the 4th of February and includes further accessibility and usability improvements, particularly across high-traffic customer journeys.

Along with the changes that went directly to improving accessibility, the following useability improvements delivered including:

Simplification of navigation and data entry

- Removal of duplicate or redundant steps
- Reduction of unnecessary form fields
- Improved keyboard-only navigation pathways

Improved validation and user feedback

- Real-time validation messaging
- Clearer confirmation of transaction outcomes
- Avoidance of generic “system error” messages without context

Reduced cognitive load

- Streamlined “Buy Card” and “Quick Top Up” workflows
- Removal of unnecessary increment controls where only single selections are permitted

Improved non-visual accessibility

- Ensuring colour is not the sole means of conveying information
- Clear text-based status indicators
- Dismissible and keyboard-accessible notifications
- Improved focus order and tab sequencing

Security and redirection clarity

- Enhanced messaging around secure payment redirection
- Explicit confirmation of completion steps

These changes directly reflect from testing undertaken by users with disabilities and GSA recommendations. The changes represent a substantive uplift in both accessibility compliance and overall usability.

Remaining Actions and Forward Plan

The remaining accessibility items are currently in delivery. These are targeted for completion in March release.

NEC’s intended approach is to:

1. Complete remediation of the outstanding items during February/March for deployment in March.
2. Commission a full independent reassessment once remediation is complete.
3. Validate not only that fixes have been implemented, but that they are effective in practice.

Our expectation is that the reassessment will demonstrate either:

- Closure of all identified issues; or
- A small number of residual items, which would then be scheduled into subsequent March/April deliveries for finalisation.

This staged and structured approach ensures improvements are implemented in a controlled and sustainable manner, while maintaining production stability and service continuity.

Other Accessibility Improvements

NEC has addressed feedback from GSA on useability and accessibility compliance of the software interface on the Ticket Vending Machine. The assessment referred NEC to remediations:

- For timer usage during TVM screen flows. NEC has enabled timer restart for users requiring more time to complete purchase processes (WCAG 2.2.1).
- The QR code for direction to Transport Canberra's website has been labelled (WCAG 3.3.6, and subject of a separate service request from Transport Canberra).
- The green success image colour has been revised to comply to colour contrast requirements (WCAG 1.4.3).

In addition, the green success image has been revised on validators, as the image used is common.

Ongoing Commitment

Accessibility is not being treated as a one-off compliance exercise. It is being embedded as an ongoing design and delivery principle within release planning, development standards and quality assurance processes.

We would welcome the opportunity to discuss this assessment and process if required.

Yours sincerely,

Mark Messenger

Mark Messenger

Head of Smart Transport ANZ
NEC Australia
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Transport Canberra

Interim Update on WCAG Accessibility
Compliance for MyWay+ Cardholder
portals

205 Feb 2026

Version: [Draft]

Date: [Publish date]

Author: Mark Messenger

NEC Australia
Commercial in Confidence

1 EXECUTIVE SUMMARY

This document provides a status update as at **20 February** on the accessibility position of the MyWay+ Customer Portal.

It presents a page-by-page summary of website accessibility performance against the WCAG 2.1 Level A and AA criteria. The summary table identifies:

- The WCAG success criteria tested
- The conformance level required (Level A or AA)
- The individual pages assessed

The table uses the following indicators:

- **Green** – Conformant
- **Grey** – Not applicable
- **Pink** – non-conformant

As at 20 February, the Portal demonstrates conformance across most criteria and pages. A small number of non-conformance items remain. In several cases, the same underlying issue affects multiple pages and/or multiple WCAG criteria. As a result, remediation of a single root cause will address multiple non-conformances simultaneously.

For transparency and clarity, the pages that follow provide a structured summary of each remaining non-conformance, including:

- The relevant WCAG criterion
- The affected page(s)
- The nature of the issue
- The end-user impact (including impact on screen reader users, keyboard-only users, or users with cognitive or low-vision needs)
- The planned remediation action

The remaining issues are scheduled for delivery during March releases. Following implementation, a full independent retest will be undertaken to verify that remediation actions have been effective.

The objective of this remediation and retest cycle is to achieve either:

- Full conformance across all tested criteria; or
- Only minor residual non-conformances, with clearly defined rectification actions and delivery timeframes.

Accessibility remediation remains an active program of work, and improvements are being embedded into standard design, development and release processes to support sustained compliance and continuous improvement.

2 WCAG 2.4.7 – Focus Visible

2.1 Pages Impacted

Majority of pages

2.2 Issue Summary

The portal supports keyboard navigation, meaning users can move through links, buttons and form fields using the Tab key instead of a mouse.

When navigating this way, the currently selected item should be clearly highlighted on screen. This highlight is known as the “focus indicator.”

In some areas of the portal, this visual focus indicator is faint or not consistently visible due to styling rules. As a result, the active element is not always clearly distinguished from surrounding content during keyboard navigation.

It is important to note that:

- The controls themselves function correctly
- Keyboard navigation works
- No functionality is disabled

The issue relates specifically to the visibility and clarity of the focus highlight.

2.3 Real User Impact

This issue primarily affects customers who rely on the focus indicator to know:

- Where they are on the page
- Which control will activate if they press Enter
- Which field they are about to complete

When the focus highlight is not clearly visible:

- Users may need to slow down to confirm their position
- They may activate the wrong control

Navigation can feel less intuitive or less predictable, especially for users who do not use a mouse, which provides the user with confidence as they directly select the point of focus, whereas a user tabbing through controls with a keyboard has indirect control.

Importantly:

- Users can still complete tasks
- The portal remains operable
- Transactions can still be processed
- This is therefore primarily a clarity and confidence issue rather than a blocking defect
- Actions that when taken affect the user's records, information and financial transactions require secondary confirmation, meaning the user will not be adversely impacted if a control is activated incorrectly due to focus uncertainty.

Providing a consistent, clearly visible focus indicator would:

- Improve ease of navigation
- Reduce uncertainty when moving between controls
- Enhance independence for keyboard users
- Bring the portal into full alignment with accessibility best practice

Clear focus styling also benefits sighted mouse users by making interactive elements more visually obvious.

2.4 Required Fix

Implement consistent visible focus styling across all interactive elements so the active element is clearly highlighted during keyboard navigation.

3 WCAG 2.4.1 – Bypass Blocks (Skip Navigation)

3.1 Pages Impacted

All pages

3.2 Issue Summary

The portal includes consistent navigation menus across pages, which is good for usability and predictability. However, there is currently no "skip" mechanism that allows keyboard users to bypass menu content and move directly to the main content when a menu entry is selected.

For mouse users, this is not noticeable, as content can be selected directly. For keyboard users, navigation moves sequentially through each menu item before reaching the page content.

3.3 Real User Impact

This issue primarily affects:

- Keyboard-only users
- Screen reader users

Without a skip link, these users must tab through the navigation menu each time they move to a new page.

Importantly:

- This does **not prevent navigation**
- It does **not block task completion**
- All functionality remains accessible
- However, it adds additional steps and can make navigation feel slower or more effortful, particularly for frequent users moving between pages such as Account History, Profile, or Top Up.

Introducing a skip link would:

- Improve efficiency for keyboard users
- Reduce repetitive navigation
- Enhance independence and comfort
- Bring the portal in line with modern accessibility standards

3.4 Required Fix

Implement a visible "Skip to main content" link that appears when focused and allows users to move directly to the primary content area.

4 WCAG 1.4.10 – Reflow (400% Zoom)

4.1 Pages Impacted

- Home
- Account History
- Park and Ride
- Balance Transfer
- Circles

4.2 Issue Summary

The portal supports browser zoom to enlarge content, which is important for customers with low vision.

On those pages that display tabular data (such as transaction history), when the browser is zoomed to very high magnification levels (e.g. 400%), the table layout does not fully reflow to fit within the screen width.

As a result, users may need to scroll horizontally to see all columns.

At normal and moderate zoom levels (100–200%), the layout performs as expected. The issue becomes apparent specifically at high magnification levels used by some low-vision users.

4.3 Real User Impact

This issue primarily affects customers who rely on high browser zoom settings

At 400% zoom:

- Content remains available
- Transactions can still be viewed
- Core functionality continues to operate correctly

However, users may need to scroll both vertically and horizontally to review information within a table.

Importantly, this does not prevent users from completing tasks. It is an efficiency and usability issue rather than a functional barrier.

4.4 Required Fix

Modify table layouts so that, at high zoom levels, content reflows into a responsive stacked or expandable format that does not require horizontal scrolling.

This will involve either:

- Converting table rows into mobile-style stacked layouts
- Collapsing secondary columns into expandable sections
- Removing fixed-width styling constraints

5 WCAG 1.3.1 – Info and Relationships and WCAG 4.1.2 – Name, Role, Value

5.1 Pages Impacted

Multiple pages

5.2 Issue Summary

On these pages, an ARIA attribute (`aria-hidden="true"`) is applied to a background image element.

The image is purely decorative (e.g., background colour or styling element) and does not convey functional or informational content.

The purpose of `aria-hidden="true"` in this context is to prevent assistive technologies from announcing decorative elements that are not meaningful to users.

5.3 Real User Impact

This issue primarily affects:

- Screen reader users

However, because the element in question is decorative and does not convey information, hiding it from assistive technologies does not remove meaningful content.

In fact, correctly hiding decorative elements:

- Reduces unnecessary screen reader verbosity
- Prevents confusion
- Improves clarity of announced content

If the image truly has no informational or functional value, there is **no negative user impact**.

The only concern would arise if an element marked `aria-hidden="true"` unintentionally contains meaningful content. In that case, a screen reader user would not be aware of that content.

5.4 Required Fix

Confirm that the element marked `aria-hidden="true"` is purely decorative and does not contain:

- Informational content
- Interactive controls
- Text
- Icons conveying meaning

If the element is decorative only, no change is required.

If meaningful content is nested within an `aria-hidden` container, adjust the structure so that only decorative elements are hidden and meaningful content remains exposed to assistive technologies.

This is a structural validation exercise and does not require backend changes.

6 WCAG 3.3.1 – Error Identification, WCAG 3.3.3 – Error Suggestion, WCAG 4.1.3 – Status Messages

6.1 Pages Impacted

- Sign Up & Login (error with password validation information, not validation itself)
- Quick Top Up
- Profile
- Account History

6.2 Issue Summary

The portal includes validation messages when users enter incorrect or incomplete information. However, these error messages are not always programmatically linked to the relevant input fields, and in some cases, they are not consistently exposed to assistive technologies.

However, these dynamic messages are not always automatically announced to assistive technologies such as screen readers.

Visually, the confirmation appears on screen. The gap relates to how that message is communicated to users who rely on non-visual feedback.

6.3 Real User Impact

This issue primarily affects:

- Screen reader users
- Users who benefit from clear, structured feedback

For most sighted users, validation messages are visible and understandable. The form does not submit when errors are present, and users can correct them.

Importantly:

- Forms remain functional
- Errors are displayed
- Users can correct and resubmit

This is primarily a clarity and consistency issue rather than a blocking defect.

Enhancing status message announcements would:

- Provide immediate confirmation feedback
- Improve confidence in payment and update flows
- Reduce uncertainty for screen reader users
- Align dynamic feedback with accessibility best practice

6.4 Required Fix

Ensure that all dynamic confirmation and error messages:

- Are implemented using appropriate accessibility attributes
- Are automatically announced to assistive technologies when they appear
- Do not require the user to manually navigate to hear them

This is achieved through small, localised enhancements to confirmation components.

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