

Public sector. The standard, and what checks it.

A guide to planning software for requests, approvals and reporting in public services, under standards whose enforcement changed in April 2026.

PUBLIC SECTOR



A guide to the administration, not the policy.

Public sector technology is unusually well supplied with standards. What changed in April 2026 is the mechanism that checked whether anyone met them, and most of the published guidance has not caught up.

This guide is about designing around that. Every figure in it is traced back to the body that published it, and where one document contradicts itself the guide gives both readings rather than choosing.

Written for service owners, digital and technology leads, and the people who approve the spending.

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What this guide is not

It is not policy advice, and it takes no position on what any service should do. It describes what the standards and the published monitoring say, with references, so that a reader can check them.

It is not a case study. No organisation is described, named or implied, and the photographs are illustrative. It makes no claim that any software reduces cost, because no published evaluation measures that.

It is not a product comparison. BespokeWorks builds software, and readers should weigh the guide accordingly. The questions on page 12 are as useful against our work as against anyone else's.

What still checks the standard.

On 1 April 2026 central digital and technology spend controls were replaced. The phrasing matters, because they were not simply removed. Departments now make most of their own digital spending decisions, and a different set of obligations sits underneath that.

What survives is worth knowing before anyone plans a procurement. Spend above five million pounds of whole life cost must be added to a pipeline, and cryptographic products at any value. Assurance must be undertaken before any procurement or discovery activity begins. Treasury approval still applies above each organisation's delegated limit, and for anything novel, contentious or repercussive. The Government Digital Service keeps a remit to enforce standards.

What changed is that the approval became devolved and threshold-based rather than central. What did not change is the guidance pointing at it.

The Technology Code of Practice still tells readers, in the present tense, that they must consider all of its points as part of the Cabinet Office spend control process. That page was last updated in July 2025. The process it names was replaced nine months later, and by then the control had moved out of the Cabinet Office anyway.

This is the shape of the whole subject. The standards are published, detailed and mostly sensible. The mechanisms that checked them have moved, and the published record of what checks what is now several months behind the arrangements.



What the monitoring found.

The accessibility regulations are the one area where an independent body tests public sector services at scale and publishes what it finds. The most recent report covers January 2022 to September 2024 and was published in December 2024. Monitoring is triennial, so this is current.

It tested 1,203 websites and 21 mobile applications. Its own summary of the result is a single sentence: accessibility issues were found on nearly all tested websites and apps.

ACCESSIBILITY MONITORING, 2022 TO 2024

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Of 1,151 websites tested had no accessibility issues at all

29,787

Individual issues found across the sites and apps tested

55.3%

Of those issues were fixed

12.4%

Were still not fixed when the site was retested

None of the 21 mobile applications was fully compliant at first test. The median website carried 23 issues or fewer; the worst carried 73. Five success criteria account for 55 per cent of everything found, and ten account for 80 per cent, which means the failures are concentrated and largely predictable: focus visibility, contrast, keyboard operation, reflow, and name, role and value.

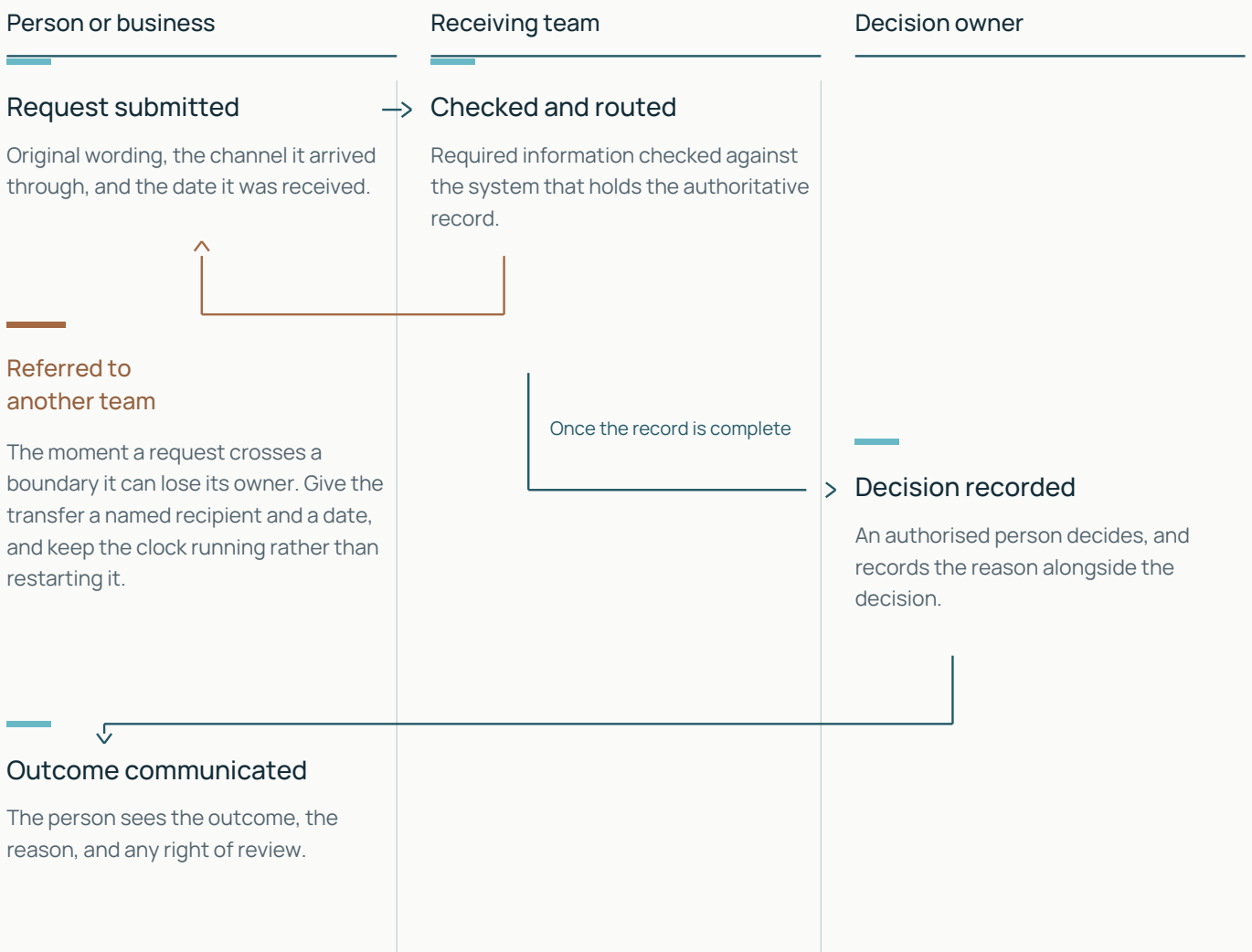
For 69 websites the organisation was sent the report and never replied to repeated contact. Those cases were closed and referred to the equality bodies.

Accessibility statements are nearly universal, at 97 per cent after monitoring. Only 65 per cent of them contain all the information they are required to.

A request, and where it waits.

A blueprint earns its place when it exposes a dependency. This fictional request crosses a team boundary, which is where public service records most often lose an owner. The route in copper is the one that produces the complaint.

ILLUSTRATIVE SERVICE BLUEPRINT



Design implication

A request that is between teams is still somebody's. If the system cannot say whose, the delay will not be visible until it is a complaint.

Five standards, and their teeth.

Each of these is real and published. What differs is what happens when a service does not meet one, and that is the column most procurement documents leave out.

Standard	What it asks for	What checks it now
Service Standard	Fourteen points, assessed. Whether a service has done enough is described in the guidance itself as a matter of judgement.	Assessment panels, with outcomes published. A red outcome keeps the service in its current phase until it is reassessed.
Technology Code of Practice	A cross-government standard for technology decisions.	Its own page still names the Cabinet Office spend control process, which was replaced on 1 April 2026. The page was last updated in July 2025.
Accessibility regulations	Websites and applications must be perceivable, operable, understandable and robust. The regulations name a European standard that carries the web content guidelines; the 2.2 AA level is what government guidance says will meet the duty.	Monitoring every three years, then referral to the equality bodies. Of 93 bodies written to since January 2022, compliance was secured with 66 without enforcement.
Algorithmic transparency	A published record for a tool that significantly influences a decision with public effect, or that interacts with the public directly.	Mandatory for central government departments. No count of tools in scope has been published, so compliance cannot be measured against a government denominator.
Digital assurance	Spend above five million pounds of whole life cost joins a pipeline, and assurance happens before procurement or discovery begins.	Devolved to each organisation since April 2026, with Treasury approval above delegated limits and for anything novel, contentious or repercussive.

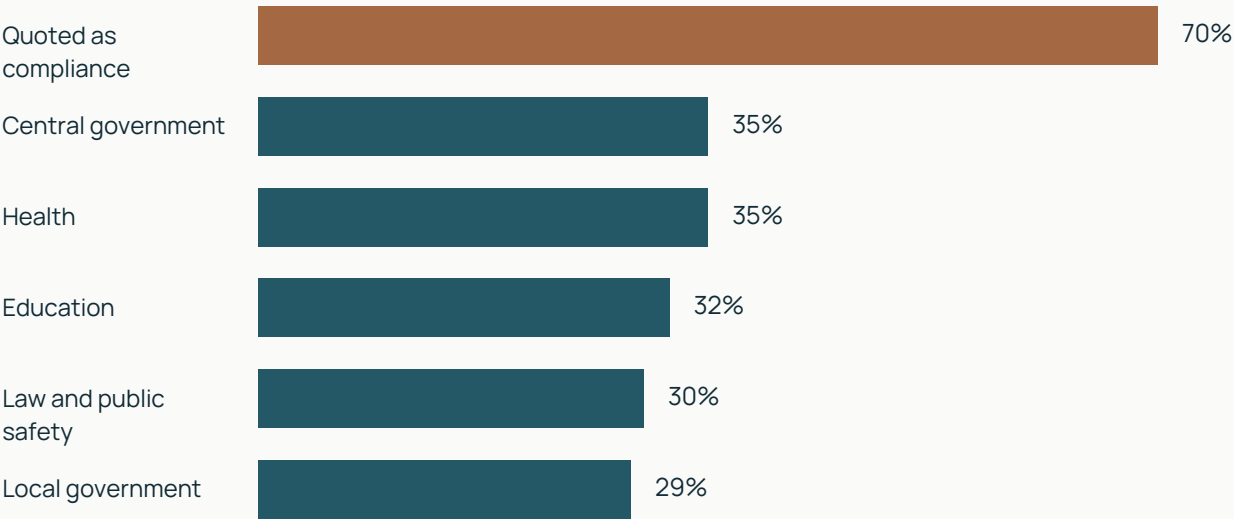
No completed formal enforcement action under the accessibility regulations is recorded in the monitoring report. The remaining cases are described as ongoing.

Two figures from one report.

The number usually quoted from accessibility monitoring is 70 per cent, and it is usually described as a compliance rate. It is not one. It is the proportion of completed cases referred to the equality bodies with a recommendation of no further action, which is a decision about enforcement rather than a measure of whether the site was fixed.

The same report publishes what was actually acceptable when each site was retested twelve weeks later, broken down by sector. Those figures sit between 29 and 35 per cent.

QUOTED RATE, AND WHAT PASSED RETEST



Accessibility monitoring of public sector websites and mobile apps from 2022 to 2024, Government Digital Service, published 17 December 2024. The first bar is the referral recommendation; the rest are the report's own acceptable-at-retest column.

Roughly two thirds of the public sector websites tested still had unfixed accessibility issues twelve weeks after being told exactly what was wrong with them.

The same document carries its own internal disagreement, which is worth knowing if the figure is ever quoted back. Its executive summary says 68 per cent had fixed the issues or had a short-term plan. Its body says 67.9 per cent. Its enforcement section says 70 per cent. All three are compared against the same 59 per cent from the previous period.

What the duties actually publish.

Public sector transparency duties produce a great deal of published data. Each of these is useful. None of them measures what it is usually taken to measure, and the gap matters when a business case leans on one.

What is published	The most recent figure	What it does not tell you
Algorithmic transparency records	152 records on the register in September 2026, against roughly 23 at the start of 2025.	Government has published no count of the tools in scope, so the only compliance estimates are external ones built by civil society.
Freedom of information statistics	87 per cent of requests answered in time in the second quarter of 2026, down from 92 per cent a year earlier.	Thirty-nine monitored central government bodies only. No English council appears in the dataset.
Local government complaints	27,625 complaints and enquiries in 2025 to 2026, a third more than the year before, with 86 per cent of investigated complaints upheld.	No breakdown by type of fault is published. Upheld also covers cases where the council put things right early, so it is not a count of councils at fault.
Procurement notices	Pipeline, tender, award, performance and payment notices, linked by one identifier across the life of a contract.	A platform for departments to submit data rather than the data itself. The debarment list has stood empty since the regime began in February 2025.

One figure deserves particular care. Late implementation of agreed complaint recommendations by councils rose from 18 per cent to 23 per cent in a year, and the ombudsman now publishes timely compliance per council. It is the closest published measure of administrative delay in local government, and it measures what happens after a decision rather than before one.

Established, and evaluated elsewhere.

Four kinds of claim circulate in this sector at once and they are not the same kind of thing. The two on this page are the ones a service owner can rely on. The two overleaf are the ones to ask questions about.

Established

The standards themselves, which are published and can be read: fourteen points in the Service Standard, four qualities in the accessibility regulations, and a defined trigger for an algorithmic transparency record.

The obligations that replaced spend controls in April 2026: the five million pound pipeline threshold, assurance before procurement or discovery, and Treasury approval above delegated limits.

Evaluated, but not here

One government digital programme has a properly designed evaluation behind it. Making Tax Digital for value added tax was assessed with matched comparison groups on administrative data, and found additional tax revenue of roughly 185 to 195 million pounds in one year.

Its outcome variable is tax revenue, not administrative cost. The separate estimate of hours saved comes from a telephone survey in which businesses were asked to recall how long the work used to take.

Asserted, and sold.

The claims most often made in a business case, and the ones least often accompanied by anything a reader could check.

Not established

That digital services reduce administrative cost. No published evaluation of a UK government digital service uses administrative cost as its outcome. The largest independent evaluation of a major programme ruled comparison methods infeasible for want of a counterfactual, and put value for money outside its scope.

That the savings claimed have been validated. On one identity programme the department reduced its own benefits estimate from 873 million pounds to 217 million, and the National Audit Office was still unable to replicate or validate what remained. Departments had to do more manual processing, which increased their costs.

Self-reported

The figure of over 45 billion pounds a year in unrealised savings comes from government's own review, rests on a band of 4 to 7 per cent of public sector spend, and was described to a select committee by the official responsible as a reasonable guess that is very difficult to measure. The figure of at least 14 billion pounds spent with technology suppliers is a third-party estimate, because government told the committee it has no central record of that spending.

Unverified is not the same as false. It is a reason to ask for the workings, and to write the measurement into the contract rather than the business case.

What a small pilot needs to show.

Agree the evidence before building anything. In a public service a pilot has a second job: it has to produce the record that an assessment, an ombudsman or a freedom of information request would ask for.

Question	What to observe	Accountable role	Release condition
Ownership	When a request moves between teams, does anything record who now owns it?	Service owner	No request in the system without a named owner.
The clock	Does time spent waiting between teams appear anywhere a manager would see it?	Operations lead	Elapsed time measured across handoffs, not within them.
Accessibility	Focus visibility, contrast, keyboard operation and reflow, tested on the real build.	Delivery team	The five most common failures tested before any user research.
The decision	Where a tool influences a decision about a person, is the reasoning recorded?	Decision owner	A transparency record drafted before launch, not after.
Cost at rest	What the second and third years cost, including licences, hosting and support.	Finance	Renewal terms agreed in writing before launch.

Keep the first release narrow enough that every rejected or delayed request can be looked at individually.

Questions for a first project.

These are the questions BespokeWorks would ask before proposing anything. They work as well against our work as against a supplier already in the building.

01 Which standards actually apply to this service, and who checks each one now?

The answer changed in April 2026 and most published guidance has not caught up. Assurance is now the organisation's own, above a threshold, with Treasury approval for anything novel or contentious. Getting this wrong is a delay at the worst point in a procurement.

02 Where does a request cross a team boundary, and what happens to its ownership there?

Handoffs between teams are where public service records lose an owner and where delay becomes invisible. This is a design question rather than a training one, and it is the one a demonstration cannot answer for you.

03 Will anything here influence a decision about a person, and who writes the transparency record?

For central government the record is mandatory once a tool significantly influences a decision with public effect. Deciding that at the end of a build is how an unpublished record happens.

04 What would have to be true in two years for this to have been worth it, and who is measuring it?

No published evaluation of a government digital service uses administrative cost as its outcome. An organisation can still measure it against its own baseline, and doing so is the only evidence that will exist for some time.

If a supplier cannot answer the first two without talking about their product, that is information as well.

Theo Coleman

Chief Technology Officer, BespokeWorks. September 2026

Sources and scope.

Every figure is traced to the body that published it rather than to coverage of it, and nothing about artificial intelligence predates 2025. Claims were checked a second time by a pass whose only purpose was to refute them, which corrected several and removed one entirely. Retrieved 19 September 2026.

Spend controls: check if you need approval to spend money on a service. Government Digital Service, Service Manual, published 1 April 2026, and the Digital Assurance Playbook of the same date.

The Technology Code of Practice. Published 14 July 2021, last updated 7 July 2025.

The Service Standard, and the service assessment guidance rewritten in September 2026. Government Digital Service.

Using artificial intelligence in services. Government Digital Service, Service Manual, published 23 September 2025.

Accessibility monitoring of public sector websites and mobile apps from 2022 to 2024. Government Digital Service, 17 December 2024. All test counts, issue counts, sector retest rates and enforcement figures.

The Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018, SI 2018/952, regulations 3, 6 and 9.

Algorithmic Transparency Recording Standard: the public register, counted at 152 records on 16 September 2026, and the mandatory scope and exemptions policy.

State of digital government review, CP 1251, and A blueprint for modern digital government, CP 1252. Both laid before Parliament on 21 January 2025.

Government's relationship with digital technology suppliers. Public Accounts Committee, HC 640, 6 June 2025.

Investigation into Verify, National Audit Office, March 2019, and Digital transformation in government, March 2017.

The administrative cost of the tax system. National Audit Office, 10 February 2025.

Evaluating additional tax revenue from Making Tax Digital for VAT, HM Revenue and Customs, 10 March 2022, and Making Tax Digital for VAT final evaluation, 27 February 2025.

HMCTS Reform digital services evaluation, overarching report. Frontier Economics and IFF Research for the Ministry of Justice, 27 August 2025.

Annual Review of Local Government Complaints 2025-26. Local Government and Social Care Ombudsman, July 2026.

Freedom of information statistics, quarterly update to June 2026. Cabinet Office, published 16 September 2026.

The Procurement Act 2023, the debarment list approved 17 November 2025, and the National Procurement Policy Statement in effect from 24 February 2025.

Photographs are illustrative and show no BespokeWorks client, member of staff or premises. Cover: photograph by Barney Goodman on Unsplash. Page 3: photograph by Jonel Andrew Francisco on Unsplash.

What could not be established

No published evaluation of a UK government digital service uses administrative cost as its outcome. No count of the tools within scope of algorithmic transparency has been published. The ombudsman publishes no breakdown of complaints by type of fault. The equality regulator's own site could not be reached to corroborate the enforcement figures or check for anything after 2024, so those figures are as the monitoring report states them. Where a source disagrees with itself, as the accessibility report does on its own headline rate, this guide gives every version rather than choosing.