

Disproportionate Burden Assessment

Last updated: 14 December 2023

The accessibility regulations stipulate that we do not need to make a website accessible if doing so would impose a disproportionate burden on us. Claiming disproportionate burden within the V&A's [Accessibility Statement](#) must be accompanied by an assessment of the burden on the organisation. The below document is the assessment.

Our organisation's size and resources

The V&A has a small in-house Digital Media Team that looks after the core offer of the V&A's website (www.vam.ac.uk). We have seven web developers to build and maintain our digital estate with over 8 million users a year (2020).

On occasion we engage external agencies to help us build, develop, and maintain the V&A's website. For the financial year 2023/24 we have no budget allocation for this type of work.

We have a long-term roadmap of product development which until 2025 is focused on supporting the [Future Plan programme](#).

We do not provide services that specifically address the needs of, or are meant for, users with disabilities. However, where appropriate we make reasonable adjustments for people who use our website.

Issue 1: Image Rich Digital Experiences using the IIIF Framework

At the V&A we have used the IIIF framework and associated open source tools to create image rich digital experiences. More information on IIIF Features repository [here](#)

Examples

1 - Universal viewer - <https://www.vam.ac.uk/articles/exploreleonardo-da-vincisnotebooks-codex-forster-iii>

A link is present near the top left corner of the 'universal viewer' that does not contain discernible text. This means that screen reader users may not be able to determine their destination or purpose.

This doesn't meet the following WCAG 2.1 Success criterion - 2.4.4 Link Purpose 4.1.1 Parsing | 4.1.2 Name, Role, Value

2 - Annotated Tour - <https://www.vam.ac.uk/articles/pietre-dure-the-tomb-of-cecilia-metella>

The text content presented throughout the annotated tour overlaps when the page is magnified up to 400% and the page width is set to 1280px and some focusable elements are not tabbable. This doesn't meet the WCAG 2.1 success criterion 1.4.10 Reflow or 4.1.2 Name, Role, Value

3 - Annotated Zoom - <https://www.vam.ac.uk/articles/the-butler-bowdon-cope>

Users using only a keyboard cannot access the pins on the annotated tour to find the content. Once open users cannot scroll with their keyboard (because the pin content doesn't receive focus)

This doesn't meet WCAG 2.1 Success Criterion 2.1.1 (Keyboard).

Assessment:

- Outstanding accessibility issues with these features can't be remedied without engaging the agency who built and developed these tools to make adjustments.
- We don't have an active contract with this agency. We estimate this work to cost around £25,000.
- Additional integration effort from the V&A Digital team would be needed – we are not currently able to support this due to resources being fully committed to a roadmap to deliver products core to the V&A's offering.

We believe that updating these features now would be a disproportionate burden within the meaning of the accessibility regulations.

To be reviewed Q1 2024/25

Issue 2: Audio Guides

Audio Guides eg <https://www.vam.ac.uk/audioguide/med-ren/> don't meet the standards for WCAC 2.1 Success Criterion 4.1.2: Name, Role, Value

Assessment:

- This version of the Audio Guides is not being actively developed
- Views of the audio guide pages accounted for 0.07% of traffic to vam.ac.uk in 2019 and 0.04% in 2020.
- Remedial work on these accessibility issues would have little to no benefit to users with disabilities due to the low usage of these audio guides overall.
- This version of the Audio Guides is now deprecated, the V&A will commit to ensuring any future audio guides created comply with WCAG success criterion.

We believe that updating this now would be a disproportionate burden within the meaning of the accessibility regulations.

To be reviewed Q1 2024/25

Issue 3: Search the Archives - <https://www.vam.ac.uk/archives/>

There are HTML markup errors, Missing Language attribute, Semantically Incorrect Headings, non-descriptive image links, insufficient colour contrast, unlabelled form fields.

This does not meet the following WCAG 2.1 standards -

3.1.1 Language of Page, 2.4.10 Section Headings, 1.3.1 Info and Relationships, 4.1.2 Name, Role, Value 3.1.1 Language of Page, 3.3.2 Labels or Instructions, 4.1.2 Name, Role, Value

Assessment:

- This version of the Archives is not being actively developed
- Users of these pages in 2020 accounted to 0.5% of total users to vam.ac.uk
- Our current development team does not have knowledge of the code base used and would need to engage additional developer capacity to remedy these issues. Cost per day estimated £800. Likely take 4 to 6 weeks to complete this work.
- Rather than fixing this old version we are committed to developing a new offer by 2025.

We believe that updating this now would be a disproportionate burden within the meaning of the accessibility regulations.

To be reviewed Q1 2024/25

Issue 4: Research Project Pages eg - <https://www.vam.ac.uk/research/projects/glastonbury-50>

HTML markup errors, Forms not fully accessible, Tables not fully accessible, Missing Alt text, Insufficient colour contrast between text and background, Nondescriptive image links, Semantically Incorrect Headings. This does not meet the following WCAG 2.1 standards - Doesn't currently meet the following WCAG 2.1 Success Criterion 1.1.1 Non-text Content, 1.3.1 Info and Relationships, 1.3.2 Meaningful Sequence, 1.4.10 Reflow 1.4.1 Use of Color, 1.4.3 Contrast (Minimum), 2.4.4 Link Purpose (In Context), 2.4.9 Link Purpose (Link Only), 3.2.5 Change on Request

Assessment:

- This version of the Research Project Pages is not actively developed
- As a percentage of page views to vam.ac.uk these pages accounted for 0.02% in 2020 and 0.03% in 2019
- We can't currently allocate resources to resolve the accessibility issues due to resources being fully committed to a roadmap to deliver products that are core to the V&A's offering.

We believe that updating this now would be a disproportionate burden within the meaning of the accessibility regulations.

To be reviewed Q1 2024/25

Issue 5: Project & exhibition specific microsities and interactives

These are non-compliant with multiple of the WCAG 2.1 success criterion and have not been fully audited.

These include:

Museum of Savage Beauty	https://www.vam.ac.uk/museumofsavagebeauty/
Secret Seekers	https://www.vam.ac.uk/seekers/
Shoes timeline	https://www.vam.ac.uk/shoestimeline/
Europe trades	https://www.vam.ac.uk/europetrades/#/
Terrible trades	https://www.vam.ac.uk/terribletrades/
Ommegang	https://www.vam.ac.uk/ommegang/
Motorways data vis	https://www.vam.ac.uk/commissions/european-motorways-1920-2020/
Big Glass Mic	https://www.vam.ac.uk/bigglassmic/
Design a Wig	https://www.vam.ac.uk/designawig
Design a Ring	https://www.vam.ac.uk/designaring/
V&A luxury time	https://www.vam.ac.uk/luxurytime/
FABRIC visualiser	http://visualiser.ssl.co.uk/vis2dtest1.html?vo=1&data=irreg_tile400&bg=FFFFFF&sf=0.005&title=Irregular%20Tiles

Assessment:

- We have assessed that it would be a disproportionate burden within the meaning of the No. 2 Regulations to pay an auditor to do a detailed check on these microsities as we believe that to be compliant these microsities would need to be redesigned and rebuilt.
- These microsities were built by various external agencies and funded from the budget allocated for the associated exhibition or project at the time.
- An estimated cost to redesign and rebuild these is around £20–50,000 per interactive.
- As this content was developed for past exhibitions, we do not have the resources to redesign them as it is not core to the V&A's current offering
- From a legacy perspective we believe that while these microsities don't meet accessibility guidelines there is a benefit to keep them live for users to access as the alternative would be to decommission them.
- When choosing new suppliers and agencies we will ensure all new interactives will be compliant.

We believe that updating these microsities and interactives now would be a disproportionate burden within the meaning of the accessibility regulations.

Issue 6 - Group Booking Platform

<https://vam.gatewayticketing.hosting/webstore/account/groupsaleslogin.aspx?cg=schools&c=southken>

As part of a change programme 'Redesign the V&A' the organisation has been looking at operational processes to improve organisational efficiency. The process for group bookings (primarily school visits) was a mostly manual process within the organisation and a number of risks had been identified in these processes - particularly in GDPR compliance.

Our existing ticketing system supplier - Galaxy have a web sales product that we have procured to replace the existing workflows. Throughout the procurement process we followed [gov.uk's recommendations](#) and stipulated that the solution should meet accessibility standards and the third party provider [Galaxy] had assured us that the met WCAG 2.1 standards to AA level.

During testing and UAT we have identified that there are a number of issues which mean that the Group Booking Platform doesn't meet the standards for WCAG 2.1 Success Criterion including: Alternative Text (Decorative Images) (1.1.1.d), Resize Text (1.4.4), Focus Order (2.4.3.a), Bypass Blocks (2.4.1), Name, Role, Value (4.1.2.a), Labels or Instructions (3.2.2), Info and Relationships (1.3.1d)

We are currently auditing the main vam.ac.uk site for compliance to WCAG 2.2 and will be including these pages / screens in that audit.

Assessment:

- The platform is being launched to replace manual time intensive processes across multiple teams where several operational risks had been captured including data protection risks.
- The work to remedy issues identified on this platform would have delayed the launch of the new platform which is time critical due to the new school terms.
- We believe the benefits of having the platform live outweigh the accessibility issues in the short term, but we are committed to improving the accessibility of the platform.
- Remedial work on these accessibility issues will be prioritised by our supplier with changes implemented by April 2024
- We will perform an audit of these pages to understand the scope and cost to meet the standards for WCAG 2.2 Success Criterion.

We believe that resolving these issues now would be a disproportionate burden within the meaning of the accessibility regulations.

How much users with a disability would benefit from making things accessible

Our users will benefit from remedying the accessibility issues detailed in this document. However we believe that users will benefit most from us focusing our available resources on fixing the most used areas on vam.ac.uk and ensuring that new products developed are accessible.

//end

