



Disproportionate burden assessment

Our approach to carrying out the checks

The initial Accessibility Monitoring report identified some fundamental issues with the accessibility functionality of the Hartpury website. In addition to manual testing based on gov.uk's guidance, we instructed our web agency, Spindogs Ltd, to investigate the problems and identify the solutions.

The investigations were complex and time consuming, firstly because the website is relatively old (2016) and features many outdated and unsupported plugins, and secondly because Spindogs did not build the website and so their developers were not familiar with the functionality of the website or its underlying architecture.

Assessment

Once solutions to the issues were identified we wanted to be reasonable in the development costs associated with the implementation and deployment of the fixes. However, in July 2022 we started the tender process to build a brand-new website to be launched in 2023. In this context, we had to determine whether it would be financially viable to address the immediate accessibility concerns for the current website when we were about to invest a significant amount of budget into creating something brand new – which would ultimately resolve the issues anyway.

Accessibility regulations state that we don't need to make all elements on a website accessible, if doing so would impose a disproportionate burden on us.

After lengthy investigations which ran into 10 weeks, (15 hours, at a cost of £1,620+VAT) Spindogs were able to identify and fix the following issues:

- Keyboard not tabbing to articles and images/links, and user not able expand the hamburger menu using a keyboard when the page is zoomed in at 200% or higher (criterion 2.1.1 and 2.4.3).
- No visible keyboard focus on dropdown, and search bar in the header receives tab focus twice but this is only visible once (criterion 2.4.7).
- Combination of red and white used throughout the site for links and buttons etc. fails, and grey fails on grey for the page options (criterion 1.4.3).



- Issues related to the , , and elements and the semantic hierarchy for lists (criterion 1.3.1).
- Ensure interactive controls are not nested. <div> element has focusable descendants (criterion 4.1.2).

The fixes were deployed on August 29th, 2021.

Spindogs estimated that the remaining issues, detailed on our [Accessibility Statement](#), required at least another 4 hours investigation to establish the solutions and would then be able to advise on further development time and cost, once established. On August 31st, 2022 we instructed Spindogs to proceed with the investigations (at a cost of approx. £432+VAT).

Estimated costs

The developers cannot give an accurate estimate of potential development costs of the outstanding issues without first completing the investigations into the solution. In order to solve the issues ahead of the deadline would have involved acquiring the services of another web development agency at significant cost.

We believed that doing so ahead of the deadline would have a disproportionate burden within the meaning of the accessibility regulations.

However, we're working towards conforming to regulation with a plan of development, which we're expecting to complete by Autumn 2022.

In reaching this decision, we have considered the size, resources, and nature of Hartpury University and University College. We recognise the majority of this work would benefit users with disabilities. In line with our strategic priorities we want to be inclusive in all we do, creating an inclusive and accessible environment, so we are endeavouring to deliver a more accessible website where it is reasonable to do so.