

Disproportionate Burden Assessment Report

Public Sector Accessibility Regulations 2018 | WCAG 2.2 AA Compliance Assessment

Document Control

Organisation:	Royal Armouries (RA)
Service / Website / System:	YouTube Video Archive
Department / Team:	Digital
Assessment Author:	Stuart Carrington, Digital Programme Manager
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Approved By:	Florence Symington, Director of Brand & Audience
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1. Purpose of this Assessment

This document records an evidence-based assessment under Regulation 7 of the Public Sector Bodies (Websites and Mobile Applications) Accessibility Regulations 2018. It evaluates whether the immediate remediation of the Royal Armouries' entire video archive to include audio description (AD) would impose a disproportionate burden on the organisation.

As required by statutory guidelines, this assessment explicitly balances our strict legal accessibility obligations against organisational resource limits, evaluates the quantitative and qualitative impact on users with visual impairments, maps out a continuous mitigation plan, and establishes an active roadmap for periodic review.

2. Relevant Legislation and Guidance

This evaluation has been conducted in accordance with the following statutory instruments and official operational standards:

Primary Legislation:

- Public Sector Bodies Accessibility Regulations 2018 - <https://www.legislation.gov.uk/ukxi/2018/952/contents>
- Regulation 7 (Disproportionate Burden criteria) - <https://www.legislation.gov.uk/ukxi/2018/952/regulation/7>

GOV.UK and Regulatory Guidance:

- Accessibility requirements for public sector websites and apps - <https://www.gov.uk/guidance/accessibility-requirements-for-public-sector-websites-and-apps>
- Model accessibility statement framework - <https://www.gov.uk/guidance/model-accessibility-statement>

3. Scope of Assessment and Technical Failures

System and Content Type Scope:

This assessment specifically encompasses the Royal Armouries' public-facing digital media services, consisting of:

647 public YouTube Video Archive assets (with an average length of 15 to 30 minutes per video).

Accessibility Issues & WCAG Compliance Failure Details:

- Identified Failure: Total absence of a synchronised audio description (AD) track or an integrated narrative alternative for pre-recorded video media assets.
- WCAG Citation: This non-compliance constitutes a direct failure of [WCAG 2.2 Success Criterion 1.2.5](#): Audio Description (Prerecorded) at Level AA.

Current Asset Audited Status:

An exhaustive internal asset audit of our historical digital footprint identified a legacy backlog of 647 distinct video records requiring individual remediation workflows. To optimise public value and target technical intervention efficiently, the Royal Armouries has divided this backlog into two categories based on audience performance analytics:

- Retained Long-Term Digital Assets: 76% have been earmarked for preservation, active remediation, and integration into the ongoing five-year compliance roadmap.
- Decommissioned Assets: Approximately 24% have been explicitly designated for permanent removal, archiving, or un-listing due to extremely low audience engagement data, including a Click-Through Rate (CTR) dropping below 2% and critically weak user retention metrics.

4. User Impact Assessment (Equality Impact Assessment Summary)

Affected User Profiles & Demographic Impact:

- Primary Impact: Blind, partially sighted, or severely visually impaired visitors and online researchers.
- Secondary Impact: Individuals with specific cognitive processing or learning adjustments who benefit from explicit, multi-sensory verbalized context.

Impact of Technical Non-Compliance:

In the absence of functional audio description tracks, visually impaired users cannot access vital, non-verbal narrative elements embedded inside the media. This includes physical choreography, historic battlefield re-enactments, close-up details of structural artifacts, armour mechanisms, and on-screen graphical or structural text, culminating in an unequal digital service experience compared to sighted site visitors.

Active Engagement and User Feedback Audit Context:

The Royal Armouries tracks essential platform usage, digital user feedback, and complaints to ensure proportionality:

- Annual Platform Engagement & Frequency of Access: The archive represents a specialized, long-tail heritage collection accessed intermittently by researchers, historical enthusiasts, and educational groups.
- Service Importance: While the video archive forms a vital educational asset, the videos themselves do not constitute critical transactional, frontline visitor operations (e.g., live

ticketing systems, core opening hours information, or primary contact routes are not impacted).

- Complaints and Alternative Requests: No formal regulatory complaints or individual statutory requests for alternative formats regarding the absence of audio descriptions in the legacy video archive have been logged at the date of this assessment.

5. Technical and Organisational Assessment

Current Technical and Operational Constraints:

The historic archive features significant technical complexities, including highly specialized, archaic military heritage vocabulary, technical metallurgical descriptions, complicating standard automated captioning or basic audio scripting.

Resource and Organisational Budget Assessment:

As a national public museum, the Royal Armouries has a statutory mandate to preserve public safety and sustain core front-line visitor operations. Financial resources for full-scale compliance audits and manual legacy remediation face severe current budget gaps, meaning complete immediate manual remediation would force the direct defunding of essential front-line operational workflows.

Remediation Models and Cost Projections Table:

Activity / Implementation Model	Estimated Timeframe	Projected Cost Structure
Internal Manual Production (Staff-led scripting, recording, and editing tracks)	Months to years of dedicated, continuous labour to complete the historical backlog.	Moderate to High net cost due to extensive diversion of technical web staff away from core duties.
External Commercial Suppliers (Third-party agency onboarding and execution)	Fast turnaround window but incurs substantial administrative and scheduling overhead.	Substantial cost; external agencies charge premium per-minute commercial rates for 647 videos.
AI-Human Hybrid Model (AI-generated scripting drafts + manual expert review)	Fast and efficient; phased over 5 years (targeting approximately 140 videos/year).	Moderate and manageable; software subscriptions combined with limited internal quality control review time.

Staff Training and Capacity Costs:

To ensure structural quality in our hybrid rollout, professional audio description training via VocalEyes is required, costing an estimated £1,500 + VAT per staff member in year one.

6. Cost Assessment of External Organisation Report/Audit

To contextualise the financial reality, the Royal Armouries reviewed the cost of hiring an external agency to produce an independent, exhaustive technical compliance audit or format this assessment report, using current Cabinet Office and government procurement guidelines:

Third-party Professional Day Rate: Ranging between £600 and £1,300 per consultant day.
Detailed Technical Audit Cost (Large Estate): Requiring between 5 to 20 days of forensic technical analysis, resulting in a total external expenditure between £46,000 and £166,400.
Standard Hourly Rates: Approximately £130 per hour.

Conclusion on External Reporting Costs

Paying for a highly detailed, external diagnostic verification on an expansive legacy archive collection of this scale constitutes an unnecessary administrative burden under Regulation 7. It directly diverts scarce public funds away from the practical, hands-on technical remediation required to resolve our underlying accessibility issues.

7. Justification for Disproportionate Burden

The Royal Armouries explicitly grounds this legal claim on valid, legally permissible criteria as set out under GDS and Central Digital and Data Office (CDDO) enforcement frameworks:

- **Valid Justification:** This claim is based on the massive scale, specialized technical volume, and historical heritage nature of our specialized archive collection (647 legacy videos), coupled with an unfavourable, disproportionate cost-to-benefit ratio for old, underperforming archival videos.
- **Strict Framework Clarification:** The Royal Armouries explicitly clarifies that this claim is not built upon a general lack of operational time or organisational priority—which are legally defined as 'weak justifications' by the Government Digital Service. Instead, it is firmly justified by the net financial cost of compliance relative to total organisational resources and the demonstrably minimal public benefit of remediating low-traffic, underperforming archival media.

8. Alternative Accessible Provision (Benefit Assessment & Mitigations)

To support affected users during the roadmap rollout, the Royal Armouries has deployed immediate, alternative accessibility provisions. The benefit of full immediate compliance is mitigated because alternative access routes already exist for users requiring assistance:

- **On-Demand Remediation:** High-quality, tailored accessible versions of any archival video asset can be produced and delivered on-demand within a reasonable turnaround framework upon request from a user.
- **Textual Alternatives:** Comprehensive HTML summaries and rich descriptive scripts are systematically integrated across our digital platforms.
- **Assisted Access Routes:** Direct manual support lines and tailored enquiry mechanisms are provided by our web administration team to assist users with visual impairments.

9. Future Improvement Plan (Remediation Roadmap)

The Royal Armouries will not avoid compliance or maintain this exemption indefinitely. A structured, five-year phased remediation roadmap has been finalised using the recommended AI-Human Hybrid model:

- Year 1 (Pilot & Infrastructure Phase): Launch pilot programme, secure professional training via VocalEyes (£1,500 per person), and complete full audio description workflows for 140 priority video assets.
- Years 2-4 (Full Production Rollout): Maintain steady production cadence, remediating 140 video assets annually using trained staff and advanced text-to-speech workflows.
- Year 5 (Backlog Completion Phase): Remediate the remaining 131 legacy videos to achieve complete historical archive compliance.
- Forward-Looking Policy Change: Active audio description creation is now structurally integrated into all new video production workflows, preventing the accumulation of future backlogs.

10. Assessment Outcome

Conclusion & Core Decision: Partial disproportionate burden applies.

Assessment Outcome: Fully remediating the historic 647 video archive immediately is formally determined to be a disproportionate burden due to the substantial financial cost, resource diversion, and negative impact on core front-line public museum services. The Royal Armouries will instead execute the structured, 5-year hybrid remediation roadmap.

11. Accessibility Statement Wording

The following formal text will be published within the Royal Armouries' official Accessibility Statement to ensure full public transparency:

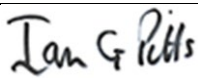
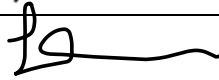
Required wording for the accessibility statement

"We believe that fully remediating our entire historic video archive with audio description immediately would be a disproportionate burden due to the volume of content. We have a 5-year plan to add audio description to our most important assets and can provide accessible alternatives on request."

12. Review and Approval

This assessment is a living legal instrument and will be formally reviewed on or before the designated review date to assess changes in remediation software costs and staffing availability.

Approved and Authorised By:

Assessment Author	Stuart Carrington, Digital Programme Manager	
Website Administrator	Ian Pitts, Website Officer	
Digital Accessibility Lead	Stuart Carrington, Digital Programme Manager	
Senior Approver	Florence Symington, Director of Brand & Audience	
	Executive approval date	22 May 2026