Accessibility Conformance Report

International Edition

VPAT® Version 2.3 (Revised)

Name of Product: Gale Primary Sources

Date: September 2021

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Evaluation Methods Used: Internal testing was conducted using the AXE and WAVE tools and manually tested using Non-Visual Desktop Access (NVDA) screen reader and JAWS on Firefox and Chrome.

Third party testing with a non-sighted user was conducted using the following OS/Browser/Screen Reader combinations:

Win 10/IE 11/Jaws 2018, Win 10/ Chrome 74/ JAWS 2018, Win 10/FF/ NVDA, Mac OS/Safari/VoiceOver

iPhone 14.2/Safari 13/VoiceOver Android 10/Chrome 87/Talkback Android Tab10/Chrome 87/Talkback iPad 14.2/Safari/VoiceOver

Applicable Standards/Guidelines

This report covers the degree of conformance for the following accessibility standard/guidelines:

Standard/Guideline	Included In Report

Web Content Accessibility Guidelines 2.0	Level A (Yes)
	Level AA (Yes)
	Level AAA (No)
Web Content Accessibility Guidelines 2.1	Level A (Yes)
	Level AA (Yes)
	Level AAA (No)
Revised Section 508 standards published January 18, 2017 and corrected January 22, 2018	(Yes)

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EN 301 549 Accessibility requirements suitable for public procurement of ICT	(No)
products and services in Europe, - V2.1.2 (2018-08)	(No)

Terms

The terms used in the Conformance Level information are defined as follows:

- **Supports**: The functionality of the product has at least one method that meets the criterion without known defects or meets with equivalent facilitation.
- Partially Supports: Some functionality of the product does not meet the criterion.
- Does Not Support: The majority of product functionality does not meet the criterion.
- Not Applicable: The criterion is not relevant to the product.
- Not Evaluated: The product has not been evaluated against the criterion. This can be used only in WCAG 2.0 Level AAA.

Table 1: Success Criteria, Level A

Criteria	Conformance Level	Remarks and Explanations
1.1.1 Non-text Content (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool)	Web: Supports Electronic Docs: Partially	Web: Form controls without visible labels use aria-labels to communicate purpose and those with visible labels use aria to associate label and input. All non-text UI elements use either title, alt or aria to communicate purpose/describe. Topic finder and highlights & notes don't work properly with all assistive technology.
• 602.3 (Support Docs)	supports	Electronic Docs: The scans of documents have a plain-text version in HTML which are independently navigable. The images, charts and graphs within the documents are not available in the plain-text version.

1.2.1 Audio-only and Video-only (Prerecorded) (Level A)		
Also applies to:		Web: Web components do not include any audio-only or
Revised Section 508	Web: Supports	video-only content.
• 501 (Web)(Software)	vveb. Supports	
• 504.2 (Authoring Tool)	Electronic Docs:	Electronic Docs: Content does not include any audio-only or
• 602.3 (Support Docs)	Supports	video-only content.
1.2.2 Captions (Prerecorded) (Level A)		
Also applies to:		Web: No web components include video
Revised Section 508	Web: Supports	
 501 (Web)(Software) 		Electronic Docs: No documents include video
• 504.2 (Authoring Tool)	Electronic Docs:	
602.3 (Support Docs)	Supports	
1.2.3 Audio Description or Media Alternative (Prerecorded)		
(Level A)		
Also applies to:	Web: Supports	Web: No web components include audio
Revised Section 508		
 501 (Web)(Software) 	Electronic Docs:	Electronic Docs: No documents include audio
• 504.2 (Authoring Tool)	Supports	

Criteria	Conformance Level	Remarks and Explanations
1.3.1 Info and Relationships (Level A)	Web: Supports Electronic Docs: Partially supports	Web: Product features a logically nested header structure, and uses a combination of HTML and ARIA semantic elements to communicate the structure of the page. Form labels and controls are properly labeled and associated. Topic finder and highlights & notes don't work properly with all assistive technology Electronic Docs: The plain text view is available for each document.
Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)		This view does not include images, tables, charts or graphs.
Also applies to: Revised Section 508 • 501 (Web)(Software)	Web: Supports	Web: Product uses tab order and page structure to ensure the content is encountered in a meaningful sequence. Electronic Docs: The plain-text view does not always convey
504.2 (Authoring Tool)602.3 (Support Docs)	Electronic Docs: Partially Supports	meaningful sequence of images, tables, charts and graphs.
1.3.3 Sensory Characteristics (Level A)		Web: When product uses shape or size to convey meaning, it also uses labels to describe that element.
	Web: Supports Electronic Docs: Does not support	that doesn't comply to modern
Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)		accessibility standards.

Criteria	Conformance Level	Remarks and Explanations
1.4.1 Use of Color (Level A)		
Also applies to: Revised Section 508 • 501 (Web)(Software)	Web: Supports	Web: When product uses color to convey meaning, it also uses labels to describe that element.
504.2 (Authoring Tool)602.3 (Support Docs)	Electronic Docs: Does not support	Electronic Docs: Documents in the product are primary sources from the past few hundred years, and many use color in a way that doesn't comply to modern accessibility standards.
1.4.2 Audio Control (Level A)		
Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Supports	Web: Product does not include any auto-playing audio Electronic Docs: Product does not include any auto-playing audio
2.1.1 Keyboard (Level A)		Web: This product can be navigated using only keyboard commands, except for the Topic Finder feature. Electronic Docs: Documents support keyboard commands, and content navigation with keyboard controls.
Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)		
2.1.2 No Keyboard Trap (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software)	Web: Supports Electronic Docs: Supports	Web: Product does not include any keyboard traps Electronic Docs: Documents in product do not include any keyboard traps

Criteria	Conformance Level	Remarks and Explanations
504.2 (Authoring Tool)602.3 (Support Docs)		
2.1.4 Character Key Shortcuts (Level A 2.1 only) Also applies to: Revised Section 508 – Does not apply	Web: Supports Electronic Docs:	Application pages has no shortcuts that can be activated using a single character key.
	Supports	
2.2.1 Timing Adjustable (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software)	Web: Supports	Web: No time limits are set for content
 501 (Web)(36)tWalle) 504.2 (Authoring Tool) 602.3 (Support Docs) 	Electronic Docs: Supports	Electronic Docs: No time limits are set for content
2.2.2 Pause, Stop, Hide (Level A)		
Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool)	Web: Supports	Web: Product contains no moving, blinking, scrolling or autoupdating information.
• 602.3 (Support Docs)	Electronic Docs: Supports	Electronic Docs: Documents contain no moving, blinking, scrolling or auto-updating information.
2.3.1 Three Flashes or Below Threshold (Level A)		
Also applies to: Revised Section 508 • 501 (Web)(Software)	Web: Supports	Web: Product does not contain anything that flashes
504.2 (Authoring Tool)602.3 (Support Docs)	Electronic Docs: Supports	Electronic Docs: Documents do not contain anything that flashes
2.4.1 Bypass Blocks (Level A)		

Also applies to: Revised Section 508 • 501 (Web)(Software) – Does not apply to non-web software • 504.2 (Authoring Tool)	Web: Supports	Web: Product features a logically nested header structure and uses a combination of HTML and ARIA semantic elements to communicate the structure of the page and allow the user to bypass blocks. Product also features as "Skip to main content" link
 602.3 (Support Docs) – Does not apply to non-web docs 	Electronic Docs: Partially Supports	Electronic Docs: Tables of contents are available for many types of documents, and assistive technology users can use this as a method of moving within a document.
2.4.2 Page Titled (Level A)	Web: Supports	Web: Product uses page titles following the schema of - Product Name -Page Type-Details
Also applies to:	Electronic Docs: Supports	Electronic Docs: Document titles are reflected in the page HTML and on various parts of the document details page.

Criteria	Conformance Level	Remarks and Explanations
Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)		
2.4.3 Focus Order (Level A)		Web: Elements can be navigated sequentially and receive visual focus except for Topic Finder.
	Web: Supports	Electronic Docs: Documents can be navigated sequentially and receive properly focus.
Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Electronic Docs: Support	
	Web: Supports	Web: Links have a description of their purpose or target destination
2.4.4 Link Purpose (In Context) (Level A) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Electronic Docs: Supports	Electronic Docs: TOC of contents links describe section headings.
2.5.1 Pointer Gestures (Level A 2.1 only)	Web: Supports	Web: All web functionality can be operated with a single pointer.
Also applies to: Revised Section 508 – Does not apply	Electronic Docs: Supports	Electronic Docs: All web content can be operated with a single pointer.
2.5.2 Pointer Cancellation (Level A 2.1 only)	Web: Supports	Web: Application controls are activated on UP event. Even if user
Also applies to: Revised Section 508 – Does not apply	Electronic Docs: Supports	accidently tap on control, he/she can move away from its target area and lift up his pointer to abort its action.
2.5.3 Label in Name (Level A 2.1 only)	Web: Supports	Application provides support with speech recognition software.

Also applies to:		
Revised Section 508 – Does not apply	Electronic Docs:	
	Partially	
	Supports	
	''	

Criteria	Conformance Level	Remarks and Explanations
2.5.4 Motion Actuation (Level A 2.1 only)		
Also applies to: Revised Section 508 – Does not apply	Web: Supports	Web: Native interface does not include motion-based functionality.
,	Electronic Docs: Supports	Electronic Docs: Web content does not include motion-based functionality.
3.1.1 Language of Page (Level A)		
Also applies to: Revised Section 508	Web: Supports	Web: The language is set in the header of each page.
• 501 (Web)(Software)		Electronic Docs: Language Translate feature specifies what
504.2 (Authoring Tool)602.3 (Support Docs)	Electronic Docs:	language content is switched into.
3.2.1 On Focus (Level A)	Supports	
Also applies to:		
Revised Section 508 • 501 (Web)(Software)	Web: Supports	Web: Product uses activate rather than focus to initiate changes of context
• 504.2 (Authoring Tool)	Electronic Docs:	
• 602.3 (Support Docs)	Supports	Electronic Docs: No items in documents initiate a change of context on focus
3.2.2 On Input (Level A)		
Also applies to:		
Revised Section 508	Web:	Web: Changing settings does not
501 (Web)(Software)504.2 (Authoring Tool)	Supports	automatically cause a change of context without informing the user.
• 602.3 (Support Docs)	Electronic	without morning the user.
, ,	Docs:	Electronic Docs: Documents do not allow
	Supports	for any changing of settings on focus.
3.3.1 Error Identification (Level A)		

Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Supports	Web: When the product generates an error message, it uses aria-live to make sure the message is communicated to assistive technology Electronic Docs: Adequate error messages are given when content is unable to be retrieved.
3.3.2 Labels or Instructions (Level A) Also applies to: Revised Section 508	Web: Supports	Web: Forms and controls have proper labeling, fieldsets and grouping.
	Electronic Docs: Supports	Electronic Docs: none of the content in product includes user inputs.

Criteria	Conformance Level	Remarks and Explanations
501 (Web)(Software)504.2 (Authoring Tool)602.3 (Support Docs)		
4.1.1 Parsing (Level A)	Web: Supports Electronic Docs:	Web: Most form elements contain duplicate ID's but otherwise product has complete element tagging, nesting and unique IDs with few exceptions. Electronic Docs: Documents have complete element tagging, nesting and unique IDs.
Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Supports	
		Web: Forms and controls are labeled using a combination of HTML and ARIA attributes. Role is used to identify various components Electronic Docs: Components with documents can be programmatically determined
4.1.2 Name, Role, Value (Level A)	Web: Supports Electronic Docs: Supports	

Table 2: Success Criteria, Level AA

Criteria	Conformance Level	Remarks and Explanations
1.2.4 Captions (Live) (Level AA)		
Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Supports	Web: Product does not contain live audio content Electronic Docs: Documents do not contain live audio content.
1.2.5 Audio Description (Prerecorded) (Level AA)		
Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Supports	Web: Web components do not include any audio-only or video-only content. Electronic Docs: Content does not include any audio-only or video-only content.
1.3.4 Orientation (Level AA 2.1 only) Also applies to: Revised Section 508 – Does not apply	Web: Supports Electronic Docs: Supports	Web: Web components do not restrict view or operation to single display orientation. Electronic Docs: Content does not restrict its view or operation to single display orientation.
1.3.5 Identify Input Purpose (Level AA 2.1 only) Also applies to: Revised Section 508 – Does not apply	Web: Supports Electronic Docs: Supports	Web: Web component input fields can be programmatically determined. Electronic Docs: Web component input fields can be programmatically determined.

1.4.3 Contrast (Minimum) (Level AA)		Web: Color contrast on all elements is 4.5:1 or greater.
Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool)	Web: Supports Electronic Docs: Supports	Electronic Docs: Color contrast on all elements is 4.5:1 or greater
602.3 (Support Docs)		

Criteria	Conformance Level	Remarks and Explanations
1.4.4 Resize text (Level AA)		
Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool)	Web: Supports Electronic Docs:	Web: Product uses CSS in a way that allows for text to easily be resized.
• 602.3 (Support Docs)	Supports	Electronic Docs: Documents use CSS in a way that allows for text to easily be resized. Document text size can be adjusted by the text resizing tool at the top of each document. PDF scans of document do not offer the OCR text but all PDF scans have an accessible HTML version.
1.4.5 Images of Text (Level AA)	Web: Supports	Web: Product includes multiple navigational workflows, including a search function capable of returning all content.
	Electronic Docs: Supports	Electronic Docs: Image scans of document have a plain-text version in HTML and are independently navigable. A few images, charts and graphs are not available in the plain-text version.
1.4.10 Reflow (Level AA 2.1 only)		
Also applies to: Revised Section 508 – Does not apply	Web: Partially Supports	Web: Web page supports reflow 400% zoom
Nevisca Section 300 Does not apply	Electronic Docs: Supports	Electronic Docs: Document page supports reflow on 400% zoom
1.4.11 Non-text Contrast (Level AA 2.1 only)		
Also applies to: Revised Section 508 – Does not apply	Web: Supports	Web: Web non-text elements have a contrast ratio of at least 3:1.
	Electronic Docs: Supports	Electronic Docs: Non-text elements have contrast ratio of at least 3:1.

Criteria	Conformance Level	Remarks and Explanations
	Web: Supports Electronic Docs: Supports	Web: Application provides support for people with low vision and cognitive disabilities as it allows users to view the application content in their desired text. Electronic Docs: Application provides support for
1.4.12 Text Spacing (Level AA 2.1 only)		people with low vision and cognitive disabilities as it allows users to view the application content in their desired text.
1.4.13 Content on Hover or Focus (Level AA 2.1 only)	Web: Supports	Web: Application does not consist of mousehover/additional content which appears when mouse pointer reaches a particular web element.
Also applies to: Revised Section 508 – Does not apply	Electronic Docs: Supports	
2.4.5 Multiple Ways (Level AA) Also applies to: Revised Section 508 • 501 (Web)(Software) – Does not apply to non-web software • 504.2 (Authoring Tool) • 602.3 (Support Docs) – Does not apply to non-web docs	Web: Supports Electronic Docs: Supports	Web: Product includes multiple navigational workflows, including a search function capable of returning all content. Electronic Docs: Documents are the result of the process of searching.
2.4.6 Headings and Labels (Level AA) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool)	Web: Supports Electronic Docs: Partially Supports	Web: Product features a logically nested header structure, and uses a combination of HTML and ARIA semantic elements to communicate the structure of the page. Form labels and controls are properly labeled and associated, except for topic finder and highlights & notes.
		Electronic Docs: Image scans often feature a table of contents, which can be used to navigate the document. Primary Source document scans feature a plain text version, but it does not include headings or labels.

Criteria	Conformance Level	Remarks and Explanations
602.3 (Support Docs)		
2.4.7 Focus Visible (Level AA)	Web: Supports	Web: Product shows visual focus on all elements. The exception is Topic Finder, which doesn't always show visual focus properly. Electronic Docs: Documents show focus on all elements.
Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	-Electronic Docs: Supports	Electronic Poess. Poeuments show rocus on an elements.
3.1.2 Language of Parts (Level AA) Also applies to: Revised Section 508 • 501 (Web)(Software) • 504.2 (Authoring Tool) • 602.3 (Support Docs)	Web: Supports Electronic Docs: Supports	Web: Product updates tags to reflect the translation of UI. Electronic Docs: Product updates tags to reflect the translation of a document.
 3.2.3 Consistent Navigation (Level AA) Also applies to: Revised Section 508 501 (Web)(Software) – Does not apply to non-web software 504.2 (Authoring Tool) 602.3 (Support Docs) – Does not apply to non-web docs 	Web: Supports Electronic Docs: Supports	Web: Main navigational header is consistent across the product, as are the search filters and document tools Electronic Docs: There are no navigational mechanisms within documents aside from the table of contents for Gale reference material. The table of contents is consistently formatted across documents
3.2.4 Consistent Identification (Level AA) Also applies to: Revised Section 508 • 501 (Web)(Software) – Does not apply to non-web software • 504.2 (Authoring Tool) • 602.3 (Support Docs) – Does not apply to non-web docs 3.3.3 Error Suggestion (Level AA)	Web: Supports Electronic Docs: Supports	Web: All components that share functionality within the product are consistently identified Electronic Docs: Documents are identified consistently

Also applies to:

Revised Section 508

- 501 (Web)(Software)
- 504.2 (Authoring Tool)
- 602.3 (Support Docs)

Errors are descriptive enough to understand the problems and user is able to avoid and correct the respective problem by reading errors.

Criteria	Conformance Level	Remarks and Explanations
3.3.4 Error Prevention (Legal, Financial, Data) (Level AA)		Web: Product does not contain any of the applicable
Also applies to: Revised Section 508		conditions
• 501 (Web)(Software)	Web: Supports	Electronic Docs: documents do not contain any of
504.2 (Authoring Tool)602.3 (Support Docs)	Electronic Docs: Supports	the applicable conditions
4.1.3 Status Messages (Level AA 2.1 only) Also applies to: Revised Section 508 – Does not apply	Web: Supports	Web: Status messages can be programmatically determined
	Electronic Docs:	
	Partially Supports	

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Notes:

Chapter 3: Functional Performance Criteria - Click to show or hide table data

Criteria	Conformance Level	Remarks and Explanations
302.1 Without Vision	Partially Supports	Users without vision will be unable to view image scans, and the OCR text is not a fully sufficient alternative to viewing the document.
302.2 With Limited Vision	Supports	The product does not interfere with the user's ability to resize text, zoom, disable CSS, insert fonts or change contrast. The document viewer features zooming, resizing and contrast adjustment tools.
302.3 Without Perception of Color	Partially Supports	The product UI does not convey information or meaning using color only. Whenever color is used to convey information, it is paired with an alternative method of conveyance.

Criteria	Conformance Level	Remarks and Explanations
		Documents in the product are primary sources from the past few hundred years, and many use shape or size to convey meaning in a way that doesn't comply to modern accessibility standards.
302.4 Without Hearing	Supports	Product contains nothing that requires user hearing
302.5 With Limited Hearing	Supports	Product contains nothing that requires user hearing
302.6 Without Speech	Supports	Product does not require speech to operate
302.7 With Limited Manipulation	Supports	users with limited manipulation will be able to use nearly all features, including the core workflows of searching, viewing documents and saving/downloading
302.8 With Limited Reach and Strength	Partially Supports	users with limited reach and strength will be able to use nearly all features, including the core workflows of searching, viewing documents and saving/downloading
302.9 With Limited Language, Cognitive, and Learning Abilities	Supports	No barriers are presented to users With Limited Language, Cognitive, and Learning Abilities

Criteria	Conformance Level	Remarks and Explanations
		Electronic Docs: Documents are presented in an AT friendly HTML format with semantic tagging to give them structure.
302.8 With Limited Reach and Strength	Web: Supports Electronic Docs: Supports	Web: Nearly all UI elements are usable with a keyboard only, except for Topic Finder. Electronic Docs: Documents are presented in an AT friendly HTML format.
302.9 With Limited Language, Cognitive, and Learning Abilities	Web: Supports Electronic Docs: Supports	Web: This product uses concise labels, uncluttered layouts and avoids jargon whenever possible. Text can be resized to assist readers, and uses a sans-serif font for readability and dyslexia. Electronic Docs: The documents are written at a variety of levels, and labeled with a Lexile score when available.

Chapter 6: Support Documentation and Services

Criteria	Conformance Level	Remarks and Explanations
601.1 Scope	Heading cell – no response required	Heading cell – no response required
602 Support Documentation	Heading cell – no response required	Heading cell – no response required
602.2 Accessibility and Compatibility Features	Partially Supports	Accessibility page is provided in footer of all products on main Gale platform. This links to Gale accessibility statement and contact information.

602.3 Electronic Support	Partially Supports	The website support.gale.com
Documentation		interface is available in HTML can and
		can be accessed with assistive
		technology. Resource guides are
		rendered for digital consumption can
		be accessed with assistive
		technology. Resource guide images,
		including images of facsimiles have
		alt-text. Tutorials have captions and
		transcriptions. Recorded training
		webinars do not have captions.
602.4 Alternate Formats for Non-	Partially Supports	On request, Gale will attempt to
Electronic Support Documentation	, , , ,	provide support materials in
		alternative formats
603 Support Services	Heading cell – no response required	Heading cell – no response required
603.2 Information on Accessibility	Partially Supports	Accessibility page is provided in
and Compatibility Features		footer of all products on main Gale
		platform. This links to Gale
		accessibility statement and contact
		information.
603.3 Accommodation of	Supports	Gale commonly uses a single direct
Communication Needs		point of contact for its technical and
		customer care support services.

Legal Disclaimer (Company)

Include your company legal disclaimer here, if needed.