

Framework for Fairness: Guidance on Procurement

Department of Communities and Local Government
12 June 2007

**CALL Centre Response
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Background

The CALL Centre is a leader in the field of communication and innovative support services for children and young people using both low tech and high tech approaches to aid children's personal communication and access to and delivery of the curriculum.

As a multi-disciplinary team we support those working with individual children and families, including teachers and schools as well as administration colleagues in education, health and social services in local authorities across Scotland. Breadth and depth of approach to service delivery, acquired over the past twenty years, has given us valuable insights into the fields of additional support needs and augmentative and alternative communication (AAC).

General Comments

CALL Centre work has included advising the Scottish Executive, Scottish Parliament, UK Government, local authorities and other public bodies on procurement decisions as regards disabled people. We agree with the statements in [5.100] on the need for straightforward, practical guidance for public authorities on procurement and public sector equality duties, agreed jointly between the Commission for Equality and Human Rights and Government. Major steps forward can be taken by adopting a systems approach to considering how best to improve accessibility. Currently, and too often, discrete structures are addressed by different groups without any group taking an informed holistic view of the individual structures.

For example, riser or elevating chairs are difficult to obtain through NHS Scotland. Wheelchair and seating assessment will not pay for the supply a chair with an elevating seat for a child to use in school. Instead the child will be supplied with a standard wheelchair (perhaps powered). A separate referral is then made to improve accessibility of the school's physical environment and the curriculum. Occupational therapy assessment might identify the need for adjustable computer trolley; adapted workbenches and desks, tables and other equipment. At secondary school similar consideration has to be made, for each subject. Because education will pay for adaptations to the school environment, and NHS Scotland pays for the wheelchair each agency operates separately, and satisfies, also separately, its own criteria for best value.

The example shows how a partial inter-agency approach can appear to tick all the boxes: reduce costs to the public purse by avoiding having to pay for adaptations to equipment year on year; benefit social inclusion because the user can participate in discussions, meetings and interact socially with their peers. Only a full inter-agency response can take a user-centred, system-wide approach to service delivery.

We note here that there are roles for Government and other interested agencies, with the Commission for Equality and Human Rights in a key position to drive

progress. We would be especially interested in further discussion on this subject.

Specific Comments

Public bodies such as local and national governments should use their position to ensure ICT equipment is accessible at the time of purchase

Many separate but interdependent layers are involved in any ICT procurement, covering many aspects, including:

- hardware including mobile phones, PS2 and PS3 boxes, Wiis plus PCs, peripherals and so on;
- software for word processing, communicating, drawing and so on;
- network management, cabling etc.

If any one of these layers reduces accessibility the whole system is affected. Equally, all layers may be potentially accessible and result in a system allowing full compatibility. But if purchase and procurement decisions do not embed accessibility then the system as a whole is not accessible. The following example illustrates.

In Scotland a major initiative will soon result in an online community of pupils, teachers, schools and other relevant agencies connected by high speed broadband network. Resources and curriculum materials will be available to anyone who is part of that community. The front end is a website portal. But only limited accessibility is available. A decision to embed a high level of accessibility was not taken in the contractual process. The result will be a portal that can only be accessed by some users.

1. A systems approach is needed to ensure that accessibility standards are set, monitored and revised at all levels. This needs to be built in to procurement procedures.
2. A functional approach should be taken. Rather than focussing on the form of equipment that will be used – broadband, digital equipment, computers – the focus should be on the task that is to be carried out e.g. accessible literature, access to numeracy, accessing services.

Web site accessibility

While there has been increasing recognition in website accessibility the parallel explosion in number of websites means there continues to be a problem of access. A number of factors are probably involved in why not more accessible. These include:

- Wide choice of automated tools means it is easy to produce a website though the output is not necessarily accessible.
- Ad hoc learning of how to produce websites and those who are teaching others how to produce websites do not have to provide information on accessibility. There is no requirement to do so.

The 2004 findings of the UK Disability Rights Commission offer a helpful review of accessibility of websites. Their findings are useful, affect procurement decisions and include the following:

- Website commissioners should have written policies for meeting the needs of disabled people.
- Organisations which provide and oversee education and training for developers, including the vendors of web-authoring tools, should promote an understanding that good development practice entails attending, and responding, to the needs of disabled people.
- The Government should raise awareness, in the public and private sector, and in the relevant professional and other occupational groups, of the Web accessibility needs of disabled people and of the actual cost of meeting those needs.
- Website developers should not rely on automated accessibility testing.
- Developers of automated accessibility checking tools should enhance their functionality to make them more useful to website commissioners and website developers.
- The Government should facilitate the development of best practice guidance for accessible website development and ongoing maintenance and thereafter promote a formal accreditation process.
- Organisations of and for disabled people should facilitate the enhancement of the skills required by disabled people to make full use of the Web.
- Developers of operating systems and browsers should take steps to ensure that accessibility options are easier to discover, understand and select.

[Extract from **The Web Access and Inclusion for Disabled People: A Formal Investigation** conducted by the Disability Rights Commission. London: TSO 2004] ISBN 0 11 703287 5 available at:

http://www.drc-gb.org/library/formal_investigation_report_w.aspx

Peoples' understanding of digital technology

In the UK substantial progress has been made towards increasing people's understanding of not only digital but also analogue technology. Examples include:

- In the early 1980s the UK government ensured BBC Microcomputers were provided to all schools. Training followed. This supply led approach resulted in increased demands once teachers and pupils saw what they could be used for.
- In the late 1990s to early 2000s further enhancement of learning was provided by National Lottery New Opportunities Fund (NOF) injection of funds. This took a three pronged approach: investment in PC and peripherals in all schools; installation of networks to ensure straightforward communication between schools, pupils, authorities and the wider world via the Internet; and finally, significant investment in teacher training for all teachers in schools across the UK.

- The European Computer Driving Licence (ECDL) initiative is accepted as a uniform standard of basic computer expertise. Universities, schools, workplaces all recognise it as an indication that the person has reached a level of competence.

This supply led approach is instructive for a number of reasons. First, initiatives of this sort can result in follow-on demand. In both the 1980s and 2000s it was found that once PCs were installed in schools purchases did not cease, but increased. As a result more teachers, more pupils and more homes literally bought-in to improved ICT equipment because they were more familiar with it. Second there was a knock on effect of improved uptake and understanding across all digital technologies. Market forces led to manufacturers of peripheral equipment ensuring compatibility between their own and devices and PCs, printers etc.

A third lesson to be learned from this supply led investment was that accessibility is nowhere near embedded, either in policy makers' thinking, or in manufacturers, suppliers or end users (unless they themselves have an accessibility requirement). In our view, significant improvement in accessibility could be made by embedding requirements on accessibility into future initiatives rather than addressing them after the fact.

1. It would be helpful to examine the standards set by the European Computer Driving Licence (ECDL) and to see how they measure up against accessibility requirements. Revise by embedding accessibility into the ECDL. It is vital that this is not seen as an extra module but is embedded through all aspects of the ECDL.
2. Commissioning processes should require that suppliers outline their accessibility arrangements in relation to the product or service being commissioned and can demonstrate ways in which they will work towards improving it. Procurement decisions should be made with reference to accessibility statements and based on knowledge of the accessibility features in question.

Practical guidance

Contracts for supply of computers or upgrading of existing stock should ensure that the computers (and any associated furniture) are accessible or can easily be modified to be accessible to people with disabilities. In reviewing existing ICT contracts and, if necessary, negotiating new ones, a commissioning body should ensure that, with regard to both stand alone and managed networks of computers:

- specialised items of hardware and software, such as an alternative keyboard, mouse or switches can be added easily;
- software needed by people with disabilities, such as speech output or screen magnification, can be installed;
- the full range of accessibility options within the operating system can be utilised, for example, to slow down mouse speed or keyboard repeat rate, or to enlarge screen fonts or reduce screen clutter;
- equipment can be placed in accessible locations, for example, so that wheelchair

users can reach the keyboard and see the screen;

- access privileges are flexible enough to allow necessary changes to afford access (for example, to adjust control panels or save individual settings for specific programs).
- physical access (such as architectural planning for accessibility: the installation of ramps, handrails, widened doorways, lifts, automatic doors, accessible toilets, showers and changing areas, adapted/adjustable furniture and equipment, ensuring sufficient space for manoeuvring and storing equipment, floor coverings and evacuation procedures)
- access for people with visual impairments is addressed (such as: improvements to signage, route finding systems, colour contrasting for e.g. door handles and steps, adjustable lighting, blinds, tactile paving, evacuation procedures)
- access for people with hearing impairments (such as: induction loops/radio systems/infrared systems, adjustable lighting, sound insulation for walls, floors and ceilings, evacuation procedures, floor coverings)

Procurement should ensure that information that is important to particular actions can be provided in an alternative form if the person may have difficulty reading information provided in standard written form, that is he or she has a print disability¹.

Procurement should include provision of information in alternative formats, such as: providing information in Braille, in large print, in audio formats, through ICT, through sign language (either on video or by using appropriately, through a recognised symbol system and other formats. Procurement should include the need to anticipate needs to make sure that any materials to be provided in alternative forms, such as Braille, large print, audio tape, video signing and electronic files were provided for translation well in advance of the time when they will be needed.

¹ “People with a **print disability** are those who cannot obtain access to information in a **print** format because they:

- are blind or vision impaired;
- have physical disabilities which limit their ability to hold or manipulate information in a printed form;
- have perceptual or other disabilities which limit their ability to follow a line of **print** or which affect their concentration;
- cannot comprehend information in a **print** format due to insufficient literacy or language skills.”

Witcher, S. (2006) Report of the **Disability** Working Group. Scottish Executive. ISBN: 0-7559-5141

Procurement Decisions

Please detach, complete and submit with your response. This will help ensure that we handle your response appropriately:

Title of consultation: **Framework for Fairness – Procurement Decisions**

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Responding as: an individual on behalf of a group or organisation?

We agree to our response being made public in print and on relevant website)?

Yes No

We are happy for the name and address above to be made public.